

VOLUME III
Responses to Comments on the
Draft Program Environmental Impact Report

City of Riverside General Plan

State Clearinghouse No. 2004021108

Lead Agency:

The City of Riverside
3900 Main Street
Riverside, CA 92522
Contact: Craig Aaron, Principal Planner
(951) 826-5989

This Final Program EIR has been prepared in compliance with
the California Environmental Quality Act
and City Resolution No. 19478, as amended.

Ken Gutierrez, Planning Director

February 2005

Consultant to the City:

Cotton/Bridges/Associates
A Division of P&D Consultants, Inc.
800 East Colorado Boulevard, Suite 270
Pasadena, CA 91101

8090.0004

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Responses to Comments on the Draft Program EIR

Purpose and Authority

This Volume III - Responses to Comments on the Program EIR documents the public review and comment period for the Draft Program EIR prepared for the City of Riverside General Plan. This Volume III, together with the Draft Program Environmental Impact Report for the City of Riverside General Plan, Volumes I and II and dated November 2004, comprise the Final Program EIR pursuant to California Environmental Quality Act (CEQA) Guidelines Section 15132 and City Resolution No. 19478, as amended.

The Notice of Completion and the Notice of Availability (NOA) for the Draft Program EIR are provided in Appendix A. The NOA was posted with the Riverside County Clerk regarding the availability of the Draft EIR as shown in Appendix A. The distribution list for the Draft EIR is also provided in Appendix A.

Presented in this Volume III are the comments and responses to written comments received during the 45-day review period for the Draft Program EIR that extended from November 19, 2004 to January 3, 2005. Five letters received after the review period ended (Letters 12 through 16) are also responded to in this document. The written comments received are presented in chronological order by date of the correspondence. Revisions to the EIR in response to comments are identified by **shading**, as illustrated in this sentence, and are contained in the Errata to the Final Program EIR. Revisions made for internal consistency, such as typographical errors, are not shaded.

Comment Letters Received

The following agencies and persons provided written comments on the Draft Program EIR:

1. Mirtha Liedl, Planner, Riverside County Waste Management Department. November 29, 2004.
2. Hideo Sugita, Deputy Executive Director, Riverside County Transportation Commission. December 7, 2004.
3. Jeffrey M. Smith, AICP, Senior Regional Planner, Intergovernmental Review, Southern California Association of Governments. December 9, 2004.
4. Teresa Tung, Senior Civic Engineer, Riverside County Flood Control and Water Conservation District. December 20, 2004.

5. Juan C. Perez, Deputy Director of Transportation, Transportation Department, Transportation and Land Management Agency, County of Riverside. December 22, 2004.
6. Robert C. Johnson, Planning Director, Planning Department, Transportation and Land Management Agency, County of Riverside. December 27, 2004.
7. Paul Frost, Associate Oil and Gas Engineer, Division of Oil, Gas, and Geothermal Resources, Department of Conservation, State of California. December 28, 2004.
8. Terry Wold, Conservation Program Coordinator, Sierra Club, San Geronimo Chapter. December 30, 2004.
9. George Hague, Resident. December 30, 2004.
10. Richard Block, Friends of Riverside's Hills. January 3, 2005.
11. Ray Hicks, Regional Manager, Public Affairs Department, Southern California Edison, January 3, 2005.
12. Terry Roberts, Director, State Clearinghouse. January 4, 2005 (Received January 6, 2005).
13. Laura J. Simonek, Manager, Environmental Planning Team, Metropolitan Water District of Southern California. December 22, 2004 (Received January 10, 2005).
14. Greg Holmes, Unit Chief, Southern California Cleanup Operations Branch – Cypress Office, Department of Toxic Substances Control. January 10, 2005.
15. Mark G. Adelson, Chief, Regional Planning Programs Section, Santa Ana Region, California Regional Water Quality Control Board. January 18, 2005.
16. Carol Gaubatz, Program Analyst, Native American Heritage Commission, State of California. January 3, 2005 (Received January 18, 2005).

Responses to these comment letters are provided following each comment letter. The format of the responses is based on a letter and number code for each comment, with the first comment in the first letter assigned code 1-1, the second comment in the first letter 1-2, the first comment in the second letter 2-1, etc.

Section 15204(a) of the CEQA Guidelines indicates that “When responding to comments, lead agencies need only respond to significant environmental issues and do not need to provide all information requested by reviewers, as long as a good faith effort at full disclosure is made in the EIR.” Some of the comments received on the Draft Program EIR for the Riverside General Plan program raise issues which are not environmental issues, or the statements provide comments or opinions on the Project unrelated to specific environmental issues. The responses to comments on the Draft Program EIR specifically focus on those comments that relate to potentially significant environmental issues, consistent with the requirements of Section 15204(a) of the CEQA Guidelines.

Change to the Project Subsequent to Draft Program EIR Publication

Subsequent to publication of the Draft Program EIR on November 19, 2004, the Riverside City Council made the determination not to pursue reduction in the City's Sphere of Influence. This action is specifically not part of the Project, and any and all references to a planned reduction in the Sphere of Influence are hereby stricken from the Program EIR.

Responses to Comments

Copies of the comment letters received and responses to those comments begin on the following page.

LETTER 1



November 29, 2004

Craig Aaron, Principal Planner
City of Riverside - Planning and Building Department
3900 Main Street, 3rd Floor
Riverside, CA 92522

**RE: Notice of Availability for Draft Program Environmental Impact Report (EIR) -
General Plan 2025 Program for the City of Riverside**

Dear Mr. Aaron:

The Riverside County Waste Management Department has reviewed the document referenced above and has the following comments:

1. The information provided on Lamb Canyon Landfill is not current. Please revise your document and incorporate the following current information:

The landfill encompasses approximately 1,088 acres, of which 144.6 acres are permitted for waste disposal. The landfill is currently permitted to receive 3,000 tons per day of trash for disposal and has a remaining disposal capacity of approximately 13,096,686 tons, as of January 1, 2004. During the year 2003, the landfill received a total tonnage of 197,944, averaging 615 tons a day. The current remaining disposal capacity is estimated to last until approximately 2023. Further landfill expansion potential exists at the Lamb Canyon Landfill.

1-1

2. The EIR should include recycling measures that focus specifically on construction and demolition waste.

1-2

Thank you for the opportunity to comment on the Draft Program – EIR for the General Plan 2025 Program. Please contact me at 951/486-3284 if you have any questions.

Sincerely,


Mirtha Liedl, Planner

PD#29465

14310 Frederick Street • Moreno Valley, CA 92553 • (951) 486-3200 • Fax (951) 486-3205 • Fax (951) 486-3230
www.rivcowm.org

 printed on recycled paper

1. **Mirtha Liedl, Planner, Riverside County Waste Management Department.
November 29, 2004.**

Response 1-1

The commentor states that the information regarding Lamb Canyon Landfill was not current. In response, the following information about the disposal capacity and allowable acreage for waste disposal of Lamb Canyon Landfill is hereby updated on pages 5.16-40 and 5.16-41 via this Final EIR. The changes do not affect any of the conclusions in the EIR.

Lamb Canyon Landfill: The Lamb Canyon Landfill is located between the City of Beaumont and the City of San Jacinto at 16411 Lamb Canyon Road (State Route 79). The landfill encompasses approximately 1,088 acres, of which 144.6 acres are permitted for waste disposal. The landfill is currently permitted to receive 3,000 tpd of trash for disposal and has a remaining disposal capacity of approximately 13,096,686 tons as of January 1, 2004. During the year 2003, the landfill received a total tonnage of 197,944, averaging 615 tons per day. The current remaining disposal capacity is estimated to last until approximately 2023. Further landfill expansion potential also exists on the site.

Response 1-2

The commentor states that recycling measures focusing on construction and demolition waste should be included in the EIR. Objective PF-5 and Policies PF-5.1 and PF-5.2 aim to minimize the amount of waste materials entering landfills by providing recycling and waste diversion programs. In response to the comment, the following additional implementation action, incorporated within the project, has been added to this bullet list, which appears on page 5.16-45 of the EIR:

- The City will review all development projects to ensure that waste generated from construction activities is recycled to the greatest extent feasible.

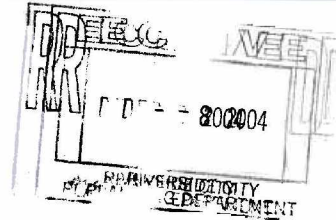


LETTER 2

Riverside County Regional Complex
4080 Lemon Street, 3rd Floor • Riverside, California
Mailing Address: Post Office Box 12008 • Riverside, California 92502-2208
Phone (951) 787-7141 • Fax (951) 787-7920 • www.rctc.org

December 7, 2004

Mr. Craig Aaron, Principal Planner
City of Riverside, Planning and Building Department
3900 Main Street, 3rd Floor
Riverside, CA 92522



Subject: Comments to City of Riverside Draft Environmental Impact Report
(DEIR) for General Plan Update

Dear Mr. Aaron:

Thank you for the opportunity to comment on the Draft Environmental Impact Report (DEIR) for the City of Riverside General Plan Update. The Riverside County Transportation Commission (RCTC) has the following comments concerning the General Plan (GP) DEIR:

1. Page 5-15.1 and Figure 5-32 identify "Key Arterials". Magnolia and Market Streets are identified as separate arterials. Shouldn't they be described as one combined arterial - Market/Magnolia? Also, shouldn't La Sierra Avenue; Martin Luther King Boulevard/14th Street; Tyler Avenue; and University Avenue be listed as Key Arterials in the City's transportation system?
2. In the "Freeways" section on page 5-15.11, a general statement is made: "Under 2004 conditions, nearly all segments of Freeways within the Planning Area are operating at LOS "F". For clarity, it should say that during Peak Hours (morning-AM and afternoon-PM) nearly all Freeway segments operate at LOS "F". During later evening, nighttime and midday hours; however, most Freeway segments operate at higher levels of service than LOS "F".
3. On page 5-15.16 under Regional Transportation Plans, the CMP, RTIP and CETAP plans are mentioned. The Riverside County Integrated Project (RCIP) is not referred to. Please include the RCIP designation in addition to or in place of CETAP. The RCIP is the umbrella project encompassing CETAP and other local transportation plans.
4. Pages 5-5.17 and 5-5.18 under Alternative Transportation - Bus, Metrolink and possible future "High Speed Rail" services are mentioned but the existing AMTRAK service to the Downtown Riverside Station is not. Please include the AMTRAK service in this section's discussion.

2-1

2-2

2-3

2-4

Comments to City of Riverside Draft Environmental Impact Report (DEIR) for
General Plan Update
Page -2-

5. RCTC and the City of Riverside have worked together on many Noise Wall projects adjacent to State Routes 60/215 and 91(Freeways). As a result of this work, it appears that it would be appropriate for the City of Riverside to put a policy in the GP that would restrict new growth or development of noise/vibration sensitive land uses immediately adjacent to either Freeway or Rail corridors unless noise and vibration mitigation is also provided. For example, Objective CCM-1, on page 5-15.41, is titled "Facilitate freeway and roadway improvements and construction to alleviate congestion and air pollution". This sub section could include a policy added under it that would restrict noise/vibration sensitive uses immediately adjacent to freeway and rail corridors or provide for mitigation such as noise walls, buffer zones of open space, and non-sensitive uses in close proximity to freeways or railroads. Also, the Mid-County Parkway (MCP) mentioned in the GP is in the City's southern sphere of influence near Lake Mathews. The MCP may ultimately be built as a Freeway and the area immediately adjacent to it on both sides should have noise sensitive uses restricted from being developed. If land use controls cannot be applied to restrict noise/vibration sensitive uses from being constructed adjacent to freeway and rail corridors, then the developer should be conditioned to provide noise walls or other appropriate mitigation.

2-5

6. The City's General plan policies promote and support transit and other alternative modes of transportation. An addition to the policies supporting transit could be exclusive bus lanes on major arterials which would promote faster and easier travel by bus.

2-5

This concludes RCTC's comments concerning the City of Riverside GP DEIR. Thank you for your consideration. Should you have any questions or require additional information, please contact me at (951) 787-7141.

Sincerely,



Hideo Sugita, Deputy Executive Director
Riverside County Transportation Commission

cc: Cathy Bechtel
Bill Hughes, G Quintero and Mike Davis (Bechtel)
Project Files

V:\FILES\Environmental Reviews Non-Project\120204CityRiverside_GeneralPlanComments.doc

2. Hideo Sugita, Deputy Executive Director, Riverside County Transportation Commission. December 7, 2004.

Response 2-1

The commentor states that certain arterials were not listed as key arterials or were listed incorrectly in the DEIR. Magnolia Avenue, Market Street, La Sierra Avenue, Martin Luther King Boulevard/Fourteenth Street, Tyler Avenue, and University Avenue are all shown as Arterials on Figure 5-39 (Master Plan of Roadways) in the DEIR. Magnolia Avenue/Market Street is a Multi-Modal Transportation Corridor and can be considered as a continuous arterial. For clarification, the text on page 5.15-1 is revised as follows:

The City of Riverside's local street system consists of arterials, collector, and local streets. The existing functional classification system is shown in **Figure 5-32**. Key arterials include Van Buren Boulevard, Arlington Avenue, Trautwein Road, Magnolia Avenue/Market Street, Iowa Avenue, Central Avenue, La Sierra Avenue, Martin Luther King Boulevard/Fourteenth Street, Tyler Avenue, University Avenue and Alessandro Boulevard.

Response 2-2

In response to the comment that the EIR should clarify that most segments of the freeways traversing Riverside operate at LOS F only during peak hours, the following information is hereby added to the EIR on page 5.15-11. The additional information does not change any of the conclusions in the EIR.

Under 2004 peak-hour conditions (morning and afternoon), nearly all segments of freeways within the Planning Area are operating at LOS F, with only some portions of the I-215 operating at or better than LOS D. **Table 5.15-4** below identifies LOS for freeway segments throughout the Planning Area. LOS F freeway conditions in the Planning Area indicate that freeway demand exceeds capacity during peak hours. These oversubscribed conditions have the potential to contribute to increased traffic on local streets, as freeway on-ramps back up onto local streets and local arterials become attractive alternative routes. Van Buren Boulevard and Alessandro Boulevard in particular are estimated to be used by many through-drivers seeking to avoid congestion at the 91/215/60 interchange.

Response 2-3

In response to the comment that the EIR should discuss the Riverside County Integrated Project (RCIP) in addition to the other regional transportation plans mentioned, the following information is hereby added to the EIR on page 5.15-16.

Several regional and subregional transportation plans and programs apply to the City of Riverside. They include the Riverside County Congestion Management Program (CMP), the Southern California Association of Governments Comprehensive Transportation Plan (SCAG/CTP), the Regional Transportation Improvement Program (RTIP), the Regional Transportation Plan, and the Riverside County Community and Environmental Transportation Acceptability process (CETAP) plan, a

part of the Riverside County Integrated Project (RCIP) that identifies alternative routes for possible major new multi-modal transportation facilities to serve the current and future transportation needs of Western Riverside County. In addition to the above transportation planning programs, the Transportation Uniform Mitigation Fee (TUMF) is a funding source for transportation improvements for participating cities in western Riverside County.

Response 2-4

In response to the comment that the EIR should discuss Amtrak service in Riverside, the following information is hereby added to the EIR on page 5.15-21. The additional information does not change any of the conclusions in the EIR.

Metrolink commuter rail service consists of heavy rail lines into downtown Los Angeles and Orange County. Metrolink is operated by the Southern California Regional Rail Authority. Lines serving downtown Los Angeles are Metrolink 91 and the Riverside Line. Service to Orange County is via the Inland Empire-Orange County line. All lines stop at the two Metrolink stations in the City of Riverside: one just east of Downtown and one in La Sierra. Amtrak service is also available at the Downtown Metrolink station. As of 2004, the Riverside County Transportation Commission (RCTC) and Metrolink were cooperatively planning the development of a new Perris Valley Line, a 22.7-mile extension of the Metrolink 91 line. Longer-term plans for the railway call for extensions eastward to the City of Hemet. As of 2004, the precise alignment of the Perris Valley line had not been determined.

In addition to Metrolink, the California High Speed Rail Authority proposes a high-speed train (HST) system for intercity travel in California between the major metropolitan centers of Sacramento and the San Francisco Bay Area in the north, through the Central Valley, to Los Angeles, Riverside and San Diego in the south. The HST would carry passengers at speeds in excess of 200 mph on a fully grade-separated track, with state-of-the-art safety, signaling and automated control systems. As of 2004, neither funding nor final alignments for this project had been determined.

Response 2-5

The comment requests that the City include a policy restricting noise- and vibration-sensitive uses adjacent to freeway and rail corridors, including sensitive land uses adjacent to Mid-County Parkway (MCP), formerly known as the Ramona Expressway/Cajalco Road. The Noise Element specifically addresses noise/land use compatibility issues. As noted on pages 5.11-30 through 5.11-32 of the EIR, the Noise Element policy N-2.1 calls for use of the noise/land use compatibility standards (Figure N-10 in the Noise Element) in land use decisions, policy N-1.5 states "Avoid locating noise-sensitive land uses in existing and anticipated noise-impacted areas," and that policy N-4.1 provides for mitigating features to be incorporated into roadway design. Additionally, all individual development projects will be subject to CEQA review, including any uses proposed along the contemplated Mid-County Parkway. The Land Use Policy Map designates lands in the vicinity of the proposed route largely as either Agricultural/Rural Residential or Kangaroo Rat Habitat.

Response 2-6

The comment suggests that additional policies supporting exclusive bus lanes on major arterials should be developed to promote more efficient travel by bus. As stated on page 5.15-21 of the EIR, the Riverside Transit Agency (RTA) recently implemented a Bus Rapid Transit (BRT) pilot project in Riverside County to provide a system of fast-moving, high-occupancy buses. Conceptually, BRT would provide several buses operating just minutes apart with limited stops and digital kiosks that give passengers up-to-the-minute arrival information. BRT would add essentially the same efficiency to bus travel that exclusive bus lanes would without the costs associated with construction and reconfiguration of the existing roadway network. The General Plan also includes policies promoting Bus Rapid Transit and expansion of the RTA transit system, as detailed in Policy CCM-9.2 (page 5.15-60).

LETTER 3



Main Office

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Riverside County: Marion Ashley, Riverside County • Thomas Buckley, Lake Elsinore • Bonnie Hukinger, Moreno Valley • Ron Lowridge, Riverside • Greg Pettis, Cathedral City • Ron Roberts, Temecula

San Bernardino County: Paul Blane, San Bernardino County • Bill Alexander, Rancho Cucamonga • Edward Burgnon, Town of Apple Valley • Lawrence Dale, San Jose • Lee Ann Garcia, Grand Terrace • Susan Longville, San Bernardino • Gary Ovlitt, Ontario • Deborah Robertson, Rialto

Ventura County: Judy Mikels, Ventura County • Glen Becerra, Simi Valley • Carl Morehouse, San Buenaventura • Toni Young, Port Hueneme

Orange County Transportation Authority: Charles Smith, Orange County

Riverside County Transportation Commission: Robin Lowe, Hemet

Ventura County Transportation Commission: Bill Davis, Simi Valley

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December 9, 2004

Mr. Craig Aaron
Principal Planner
Planning and Building Department
City of Riverside
3900 Main Street, 3rd Floor
Riverside, CA 92522

RE: **Comments on the Draft Environmental Impact Report for the City of Riverside General Plan Update - SCAG No. I 20040794**

Dear Mr. Aaron:

Thank you for submitting the **Draft Environmental Impact Report for the City of Riverside General Plan Update** to SCAG for review and comment. As areawide clearinghouse for regionally significant projects, SCAG reviews the consistency of local plans, projects, and programs with regional plans. This activity is based on SCAG's responsibilities as a regional planning organization pursuant to state and federal laws and regulations. Guidance provided by these reviews is intended to assist local agencies and project sponsors to take actions that contribute to the attainment of regional goals and policies.

It is recognized that the proposed Project considers the comprehensive update of the City of Riverside General Plan.

SCAG staff has evaluated the **Draft Environmental Impact Report for the City of Riverside General Plan Update** for consistency with the Regional Comprehensive Plan and Guide and Regional Transportation Plan. The Draft EIR includes a discussion on the proposed Projects' consistency with SCAG policies and applicable regional plans, which were outlined in our March 15, 2004 letter on the Notice of Preparation (NOP) for this Draft EIR.

The Draft EIR, in Section 5.9: Land Use and Planning and Appendix F: SCAG Policy Consistency Matrix, cited SCAG policies and addressed the manner in which the proposed Project is consistent with applicable core policies and supportive of applicable ancillary policies. The Draft EIR incorporated a side-by-side comparison of SCAG policies with a discussion of the consistency or support of the applicable policies with the proposed Project. This approach to discussing consistency or support of SCAG policies is commendable and we appreciate your efforts. Based on the information provided in the Draft EIR, we have no further comments. A description of the proposed Project was published in the November 16-30, 2004 Intergovernmental Review Clearinghouse Report for public review and comment.

If you have any questions, please contact me at (213) 236-1867. Thank you.

Sincerely,

JEFFREY M. SMITH, AICP
Senior Regional Planner
Intergovernmental Review



3-1

3. **Jeffrey M. Smith, AICP, Senior Regional Planner, Intergovernmental Review, Southern California Association of Governments. December 9, 2004.**

Response 3-1

The comment states that the project is consistent with all applicable SCAG policies, the Regional Comprehensive Plan and Guide and the Regional Transportation Plan. The comment is acknowledged, and no further response is required.

General Manager-Chief Engineer



RIVERSIDE, CA 92501
951.955.1200
951.788.9965 FAX

RIVERSIDE COUNTY FLOOD CONTROL
AND WATER CONSERVATION DISTRICT

December 20, 2004

DEC 22 2004

LETTER 4

Mr. Craig Aaron, Principal Planner
City of Riverside
Planning and Building Department
3900 Main Street, 3rd Floor
Riverside, CA 92522

Dear Mr. Aaron:

Re: Notice of Availability of a Draft
Program Environmental Impact Report
for the General Plan 2025 Program

This letter is written in response to the Notice of Availability of a Draft Program Environmental Impact Report (DPEIR) for the General Plan 2025 Program. The General Plan 2025 Program will consist of the adoption and implementation of the following: City of Riverside (City) General Plan 2025; comprehensive revision of the City's zoning code and the rezoning of properties to reflect new zone names; comprehensive revision of the City's subdivision code; the Citywide Design Guidelines; and the Magnolia Avenue Specific Plan. The City of Riverside is located in western Riverside County and is bounded on the north by the unincorporated Riverside County communities of Rubidoux and Jurupa and the City of Colton (San Bernardino County), on the east by Riverside County and the City of Moreno Valley, on the south by unincorporated communities of Riverside County and on the west by Riverside County cities of Norco and Corona.

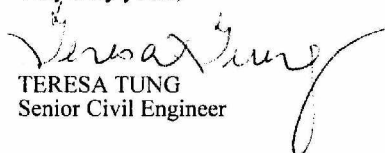
The Riverside County Flood Control and Water Conservation District (District) has the following comment regarding the DPEIR:

4-1

The City should consider including an exhibit for proposed drainage facilities similar to Figure 5-43 (which shows existing drainage facilities) in the DPEIR. Copies of the District's Master Drainage Plans (MDPs) for areas within the City can be viewed and downloaded online at www.floodcontrol.co.riverside.ca.us/mdp.asp. To obtain further information on the MDPs and the proposed District facilities, contact Art Diaz of the District's Planning Section at 951.955.1345.

Thank you for the opportunity to comment on the Notice of Availability and DPEIR. Please forward any subsequent environmental documents regarding the project to my attention at this office. Any further questions concerning this letter may be referred to me at 951.955.1233 or Marc Mintz at 951.955.4643.

Very truly yours,


TERESA TUNG
Senior Civil Engineer

c: TLMA
Attn: Greg Neal

MAM:mcv
PC\91783

4. Teresa Tung, Senior Civic Engineer, Riverside County Flood Control and Water Conservation District. December 20, 2004.

Response 4-1

The comment suggests that the Draft EIR include an exhibit for proposed drainage facilities in the Planning Area. As stated in the DEIR on page 5.16-5, local and regional drainage facilities may have to be expanded or new facilities constructed to accommodate both existing and planned development. As this is a first-tier, Program EIR, CEQA analysis of the construction of such specific facilities may be properly deferred until plans for such facilities are developed. The City identifies need drainage facilities improvements in its Capital Improvement Program and updates the CIP as needed in response to changing conditions. Since detailed plans for future expansion are not available at this time, an exhibit is not available to be included in the EIR.



LETTER 5
COUNTY OF RIVERSIDE
TRANSPORTATION AND
LAND MANAGEMENT AGENCY
Transportation Department



George A. Johnson, P.E.
Director of Transportation



December 22, 2004

Mr. Craig Aaron, Principal Planner
City of Riverside – Planning and Building Department
3900 Main Street – Third Floor
Riverside, CA 92522

SUBJECT: City of Riverside General Plan 2025 – Circulation Element

Dear Mr. Aaron:

The County of Riverside Transportation Department is please to provide these comments in response to your recent notice of availability regarding the City of Riverside's new General Plan 2025.

5-1

1) We have noted that the Master Plan of Roadways – Figure CCM 4, does not appear to reflect the outcome of a recent joint City/County planning effort with respect to roadway alignments in the Woodcrest area. These include the realignment of McAllister Street to connect to La Sierra Avenue in the vicinity of Dufferin Avenue, and the addition of a new Collector Road from McAllister Street easterly to Van Buren Boulevard. Such modifications will serve to ease impacts to the City residents along McAllister Street southerly of Victoria Avenue, and to Victoria Avenue through the Greenbelt.

5-2

2) We would also like to note that Roberts Road, Chicago Avenue and Gentian Avenue are all considered local streets by the County. Local citizens have been very concerned and divided with respect to the designation of local residential streets in this area as Collectors. The roads in this area have all historically developed with fronting residential uses, and therefore do not have the ability to serve as adequate Collectors without impacting adjacent residents. We therefore request that the collector designation be removed from these roads, and that language be added to the General Plan that promotes the use of several local roads in this area to spread and carry local traffic. This would be consistent with the recommendation made by the Washington - Alessandro Committee (The WAC), established jointly by the City and the County to look at circulation issues in this area.

5-3

4080 Lemon Street, 8th Floor • Riverside, California 92501 • (951) 955-6740
P.O. Box 1090 • Riverside, California 92502-1090 • FAX (951) 955-3198

December 30, 2004
Mr. Craig Aaron, Principal Planner
City of Riverside – Planning and Building Department
RE: City of Riverside General Plan 2025 – Circulation Element
Page 2

3) We also note discrepancies between our two Circulation plans for the area south of Van Buren Boulevard between Washington Street and Cole Avenue.

The extent of the General Plan designations for Krameria Avenue, Porter Street and Nandina Avenue are not in agreement. For example, the County's General Plan shows that Nandina extends westerly to Washington Street, while the City's proposed plan terminates it at Wood Street. Nandina is planned to connect to I-215 via a realignment of Oleander, and is therefore a regionally significant route. Also, we have had a number of discussions with respect to the appropriate plan designation for Lurin Avenue, which does not currently appear on either the City or County plan. Much of this area is part of the Alta Cresta Specific Plan and both the City and County have granted entitlements based upon our respective plans. Another recommendation of the WAC was that no fronting developments be permitted on Lurin Avenue to promote its use as a Collector roadway. It is our hope that we can reach agreement on a Circulation Plan for the area that satisfies the concerns of both the City and County, and request to continue working through these issues with the City.

5-4

4) Blackburn Road, north of El Sobrante, is shown as a 4-Lane Highway in the City's General Plan. Blackburn Road is essentially a Collector Roadway in the County already built out as 2-Lanes through the Victoria Grove development between La Sierra and McAllister.

Please see attached for your use and reference the Riverside County Circulation Plan for the Lake Mathews/Woodcrest Area Plan, which encompasses the City's southerly Sphere of Influence.

5-5

In the Highgrove area, the General Plan for the City and County appear to be generally consistent. The City's General Plan identifies an un-named north-south Collector roadway (California?) that is not identified on the County's General Plan. Although the County's General Plan does not designate Mt. Vernon Avenue as a four-lane road, it is being built to that standard in the County through approved development projects.

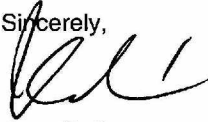
The County and the City's General Plan also appear to be generally consistent in the Jurupa area.

Thank you for the opportunity to comment. We look forward to working with City staff to resolve the areas of inconsistency between our two plans. Please feel free to contact Ed Studor, Administrative Manager or myself at (951) 955-6767 to further discuss these comments.

5-6

December 30, 2004
Mr. Craig Aaron, Principal Planner
City of Riverside – Planning and Building Department
RE: City of Riverside General Plan 2025 – Circulation Element
Page 3

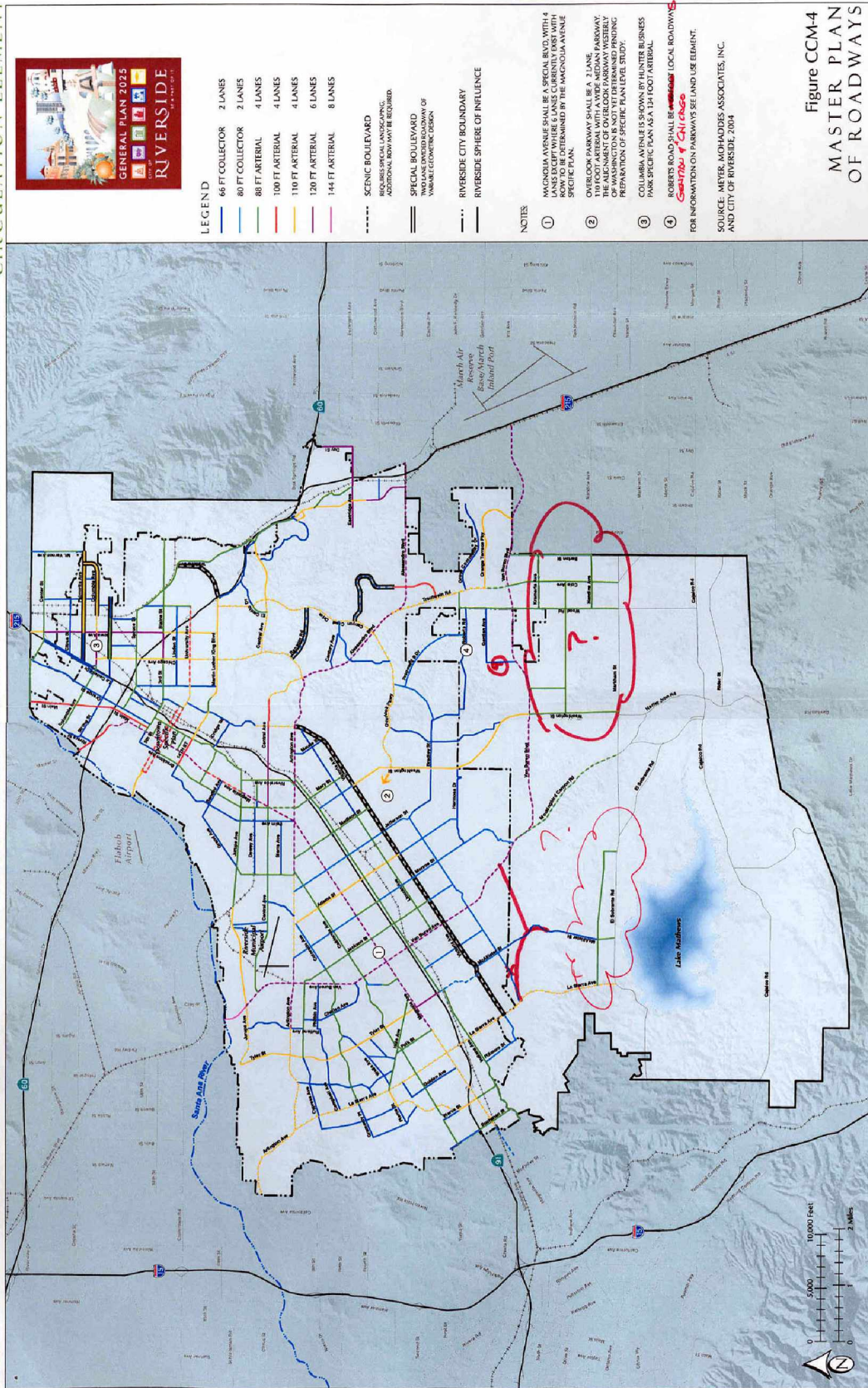
Sincerely,

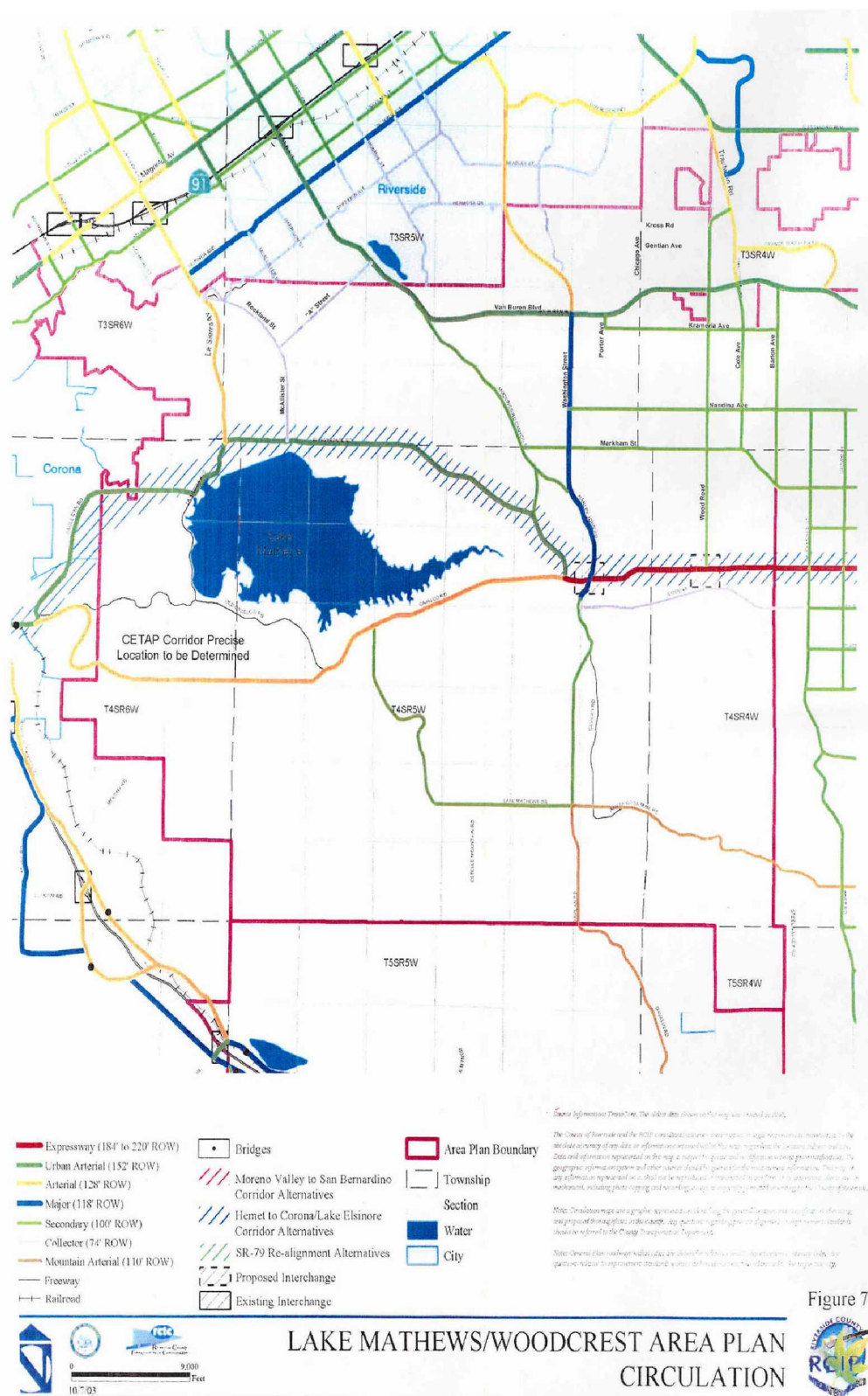


Juan C. Perez
Deputy Director of Transportation

GAJ:ES:es
Attachment

cc: George Johnson
Ed Studor
Greg Neal, TLMA
Supervisor Buster
Attn: Robert Caliva
Supervisor Tavaglione
Attn: John Field
Supervisor Ashley
Attn: Rick Hoffman





5. Juan C. Perez, Deputy Director of Transportation, Transportation Department, Transportation and Land Management Agency, County of Riverside. December 22, 2004.

Responses 5-1 and 5-2

The work of the Washington Area Committee (WAC) resulted in a series of recommendations for improving circulation in southeastern Riverside and adjacent unincorporated Riverside County areas within the City's sphere of influence. The non-binding recommendations of this ad hoc committee were forwarded to appropriate City and County departments for consideration.

As part of the General Plan process, City staff reviewed the recommendations with the General Plan Citizens' Advisory Committee (CAC) to determine which ones would be appropriate for inclusion in the Circulation and Community Mobility Element, based upon technical input provided by City Public Works staff and land use and environmental considerations presented by Planning staff. Based on the City's technical review and policy direction provided by the CAC, the City prepared the Master Plan of Roadways included in the Draft General Plan as Figure CCM-4 (Figure 5-39 in the EIR). A key consideration was ensuring consistency with Proposition R and Measure C provisions regarding limiting additional new traffic within the greenbelt area. The circulation plan presented in Figure CCM-4 represents a good balance between the City's circulation and land use policy objectives.

With regard to McAllister Street, the extension was included in the General Plan traffic model as noted and is included as part of the City's Master Plan of Roadways; however, the road was inadvertently left off Figure CCM-4 in the General Plan and Draft Program EIR. Figure CCM-4 will be corrected in the final General Plan to show the planned McAllister Street connection to La Sierra Avenue. Similarly, Barton Road between Grove Community Drive and Alessandro Boulevard was also inadvertently left off and will be added to CCM-4 as a 66-Foot Collector; it was modeled as a two-lane roadway. As stated in Policy CCM-20 of the Circulation and Community Mobility Element (p. CCM-20), Iris Avenue is recognized as a Local requiring a link of the two ends and will be added to Figure CCM-4 as a 66-Foot Local. All of these adjustments are consistent with the WAC recommendations.

Response 5-3

As noted in Note 4 on Figure CCM-4 in the Circulation and Community Mobility Element, Roberts Road is designated as a 66-Foot Local street. As stated in Policy CCM-20 of the Element (p. CCM-20), Dauchy Avenue is recognized as a Local. Similar language will be added to address Gentian Avenue and Chicago Avenue consistent with the CAC's and WAC's recommendations, and the connections will be shown on Figure CCM-4.

Response 5-4

Please refer to Response 5-1. The City has considered the recommendations of the WAC and has included those recommendations that appropriately balance Riverside's mobility and land use objectives. Specifically with regard to Lurin Avenue, many homes have recently been constructed to front this roadway, and the City made the determination that streets such as Roberts and Gentian better meet local circulation needs. The City's policy is

to avoid back-up treatment along two-lane roads, and this position has been made clear to the County in several previous meetings.

Response 5-5

The 1994 General Plan shows Oleander Avenue between La Sierra Avenue and Vista Del Lago as an 88-Foot Arterial. This was carried over to CCM-4 on the General Plan. However, this street has since been built in the County as a two-lane local street through existing developments and is called Blackburn Road. With the addition of McAllister Road, this is not needed as an arterial street and will be deleted from the General Plan.

This comment does not address an environmental issue nor raise any question regarding the analysis or conclusions in the EIR. The comment acknowledges general consistency between the City's and County's circulation plans for the Highgrove area.

Response 5-6

This comment does not address an environmental issue nor raise any question regarding the analysis or conclusions in the EIR. The comment acknowledges general consistency between the City's and County's circulation plans for the Jurupa area.

As a concluding response relative to questions of consistency between City and County plans for the City's southern sphere area, the City notes that a key action that the City has committed to in the General Plan Implementation Plan is to continue to work with the County to resolve any major City/County differences between land use and circulation plans in the sphere area to achieve plans that are acceptable to both jurisdictions.

LETTER 6



Tony Carstens
Agency Director

COUNTY OF RIVERSIDE
TRANSPORTATION AND
LAND MANAGEMENT AGENCY

Planning Department



Robert C. Johnson
Planning Director

December 27, 2004

City of Riverside Planning Department
ATTN: Mr. Craig Aaron, Principal Planner
3900 Main Street, 3rd Floor
Riverside, CA 92522

RE: NOTICE OF AVAILABILITY OF A DRAFT PROGRAM ENVIRONMENTAL IMPACT REPORT FOR THE CITY OF RIVERSIDE GENERAL PLAN 2025, ZONING CODE UPDATE, SUBDIVISION CODE UPDATE, CITYWIDE DESIGN GUIDELINES AND THE MAGNOLIA AVENUE SPECIFIC PLAN

Dear Mr. Aaron:

Thank you for providing the Riverside County Planning Department the opportunity to review the above Draft Program Environmental Impact Report (PEIR), which was reviewed in conjunction with the City's proposed Draft General Plan 2025 (hereafter "Project") and associated regulatory documents. This letter provides County staff's comments on the Draft PEIR and the County reserves the right to provide further comments on the City's General Plan, Zoning Code and Subdivision Code Updates as well as the City's Design Guidelines and referenced Specific Plan.

The California Environmental Quality Act (CEQA) encourages the use of tiering environmental analyses and the preparation of a program EIR is appropriate to address the broader environmental effects of a long-term planning document such as a general plan. Although the contents of a program EIR are the same as those required of a project EIR, the analysis in a program EIR does not require the same level of detail and specificity as a project EIR. Pursuant to CEQA Guidelines Section 15168(b), the preparation of a program EIR can provide the following advantages:

- 1) Provision of a more exhaustive consideration of impacts and alternatives than would be practical in an individual EIR
- 2) Focus on cumulative impacts that might be slighted in a case-by-case analysis
- 3) Avoidance of continual reconsideration of recurring policy issues
- 4) Consideration of broad policy alternatives and programmatic mitigation measures at an early stage when the agency has greater flexibility to deal with them
- 5) Reduction of paperwork by encouraging the reuse of data (through tiering).

The City of Riverside is located in western Riverside County and is bounded on the north by the unincorporated Riverside County communities of Rubidoux and Jurupa and the City of Colton (in San Bernardino County), on the east by the City of Moreno Valley, to the south by

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(951) 955-3200 • Fax (951) 955-3157

Indio Office • 82-675 Hwy 111, 2nd Floor
Room 209, Indio, California 92201
(760) 863-8277 • Fax (760) 863-7555

Murrieta Office • 39493 Los Alamos Road
Murrieta, California 92563
(951) 600-6170 • Fax (951) 600-6145

City of Riverside
#2004 Riverside GP PEIR
Page 2 of 4

unincorporated communities of Riverside County, and to the west by the cities of Norco and Corona. As indicated in the Draft PEIR, the Project planning area consists of approximately 93,000 acres, of which about 52,000 acres lie within Riverside City limits. The remaining 41,000 acres include the City's Northern Sphere of Influence and the "near" Southern Sphere of Influence, which encompasses lands from the City's southern border to the crest of the Cajalco Ridge, just south of Cajalco Road.

6-1

County Planning staff offers the following comments for your consideration and incorporation into the Draft PEIR:

- 1 The proposed General Plan states that the City is in the process of applying to the Local Agency Formation Commission (LAFCO) to reduce the City's Southern Sphere of Influence. This significant reduction in the City's Sphere of Influence needs to be clearly identified in the Draft PEIR as part of the project description.
2. Under the Project Description, the Draft PEIR discusses the relationship of the proposed City General Plan with existing local and regional plans. Among the plans discussed are the County General Plan, Multiple Species Habitat Conservation Plan (MSHCP) for Western Riverside County, the Community and Environmental Transportation Acceptability Process (CETAP) and the Cities/County Memorandum of Understanding (MOU).

6-2

The MOU is a mutually cooperative agreement in which the cities and the County agree to adopt certain policies and ordinances that will facilitate coordinated development and supporting infrastructure necessary for the long-term economic viability of jurisdictions within the County. Additionally, the County agreed to adopt and implement comparable development standards to that of the affected city within city spheres of influence. This includes discussion with city staff prior to approving development projects within a city sphere that would require rezoning which may be inconsistent with the City's adopted general plan. In this MOU, the cities also agreed to adopt a policy that would provide for joint project review for city projects within one-half mile of the city limit. It should be noted that although the City has included a majority of its spheres of influence in the Project planning area and is proposing to apply City proposed land use designations, the City is under no obligation to annex properties within their sphere at any time, if at all. Until such time as the City annexes its spheres of influence, the County has jurisdiction over unincorporated areas.

6-3

The County did not agree to be bound by City land use designations or densities, only that City regulations and development standards would be considered in conjunction with new development projects. The statement that "the County also agreed that development projects within a city's sphere of influence would be reviewed within the context of the city's applicable land use regulations and development standards" is ambiguous, especially when it appears that the City's proposed land use designations differ substantially from existing County land use designations.

3. Approximately 41,000 acres in the Project planning area lie outside the Riverside City limits and within the unincorporated areas of the County. The City's proposed land use designations do not reflect existing land use approvals within the unincorporated areas that are within the City's Spheres of Influence. As such, it should be clearly stated that

6-4

City of Riverside
#2004 Riverside GP PEIR
Page 3 of 4

- | | |
|--|-------------|
| <p>the Project conflicts with the Riverside County General Plan. Moreover, failure to reflect existing County approvals, including adopted specific plans, directly impacts land use planning and indirectly affects population, traffic, noise, air quality and other issues as well. The lack of recognition of existing development approvals within the County may result in an underestimate of potential residential build-out, affecting impact analyses of these issues.</p> | <p>6-4</p> |
| <p>4. The Draft PEIR does not acknowledge existing land use approvals within jurisdictions adjacent to the City, including those developments located within San Bernardino County. New development, which has the potential to impact City infrastructure, should certainly be considered under the Cumulative Analysis Section of the Draft PEIR.</p> | <p>6-5</p> |
| <p>5. The average daily trip factors used in the Air Quality Worksheets included as Appendix C appear to be extremely low in relationship to ITE trip generation standards utilized in most traffic models. Please include a discussion of how these numbers were derived.</p> | <p>6-6</p> |
| <p>6. The City's use of the Hillside Residential Land Use Designation is intended to be applied to hillside areas where slopes exceed 15%. It is the County's position that properties with slopes less than 15% should not be subject to the Hillside Residential land use designation. The City's Land Use Policy Map should be revised accordingly and reflect existing County land use approvals.</p> | <p>6-7</p> |
| <p>7. The application of Proposition R and Measure C to unincorporated areas whose residents were not permitted to vote on said legislative matters is inappropriate except as the provisions relate to annexations. The County and its residents are not required to adhere to Proposition R and Measure C, which were passed by City voters.</p> | <p>6-8</p> |
| <p>8. Under the discussion of impacts to agricultural lands, the Draft PEIR states, "no land previously designated for agriculture has been redesignated for another use." In view of Comment #3 above, a redesignation of agricultural lands located in unincorporated areas may be appropriate where projects have existing land use entitlements.</p> | <p>6-9</p> |
| <p>9. Agricultural preserve information from the County Geographical Information System deals only with whether land is or has even been in a preserve, not whether a contract remains in effect or remaining term of contract. The Draft PEIR should discuss that much of the area is subject to Notice of Nonrenewal, by which affected contracts may have expired.</p> | <p>6-10</p> |
| <p>10. The Draft PEIR evaluates Project impacts based on SCAG population growth projections and anticipates the construction of approximately 38,100 new residential dwelling units and approximately 39.6 million square feet of commercial/industrial use. Staff assumes that the development projections are based on the potential ultimate build-out of vacant land under the new land use designations within the City and its spheres of influence as identified above. However, the given development projections may be based on the difference between existing development and potential build-out of the Project planning area under the City's proposed land use designations. The Draft PEIR should clearly identify what factors were used in making these projections.</p> | <p>6-11</p> |
| <p>11. It does not appear that the Draft PEIR utilized potential maximum density allowed under the proposed residential land use designations and possible density bonuses when</p> | <p>6-12</p> |

City of Riverside
 #2004 Riverside GP PEIR
 Page 4 of 4

projecting the development of residential housing under the Project. Within the mixed-use land use designations, utilizing maximum density allowed under each category and based on "net" acreages (as opposed to gross) to calculate possible future development, the total could potentially be as high as 36,390 dwelling units for these three designations alone. Dependent on what factors were used to determine ultimate build-out within the Project planning area and new development projections, the analyses under Air Quality, Noise and Transportation/Circulation may require revision.

6-12

The proposed General Plan includes a table with the new land use designations and total net acreages of each designation. It would be appropriate to include this table in the Draft PEIR and further expand the information to clarify the factors used to arrive at these projections (i.e., vacant lands vs. the entire Project planning area, maximum density factors as opposed to average density factors, net acreages vs. gross acreages, etc.).

12. The proposed mixed-use designations, which will also allow increased density of residential housing and intensity of land uses, are intended to permit growth focused on infill areas along the City's major transportation corridors. The Draft PEIR states that potential environmental impacts and mitigation to reduce said impacts will be identified on a project-by-project basis through subsequent environmental review. In these cases, use of the infill exemption under CEQA would not be appropriate even if a future project happens to be consistent with the general plan land use designation since this environmental document does not adequately address future project impacts nor provide feasible mitigation.

6-13

13. Under the Alternatives analysis of the Draft PEIR, staff believes that it is appropriate to consider use of the County's land use designations and existing land use approvals within the unincorporated areas as a viable alternative since annexation of these areas is not proposed under the Project nor anticipated in the near future.

6-14

The Draft PEIR provides an analysis of the potential environmental impacts of the City's proposed General Plan. As the General Plan is a policy document, much of the mitigation measures identified to mitigate potential impacts are policies and may not be effective as mitigation. The Draft PEIR should clearly identify actions required by the City to make said policies viable (i.e., resolution, ordinance, etc.). However, to identify such policies as mitigation measures for lands within the unincorporated areas is not adequate mitigation since the City has no jurisdiction to enforce these measures.

6-15

Thank you for considering our comments and for the opportunity to review the Draft PEIR for the City's General Plan 2025. If you should have any questions regarding these comments, please contact Kathleen Browne, Urban Regional Planner III, at (909) 955-4949.

Sincerely,

RIVERSIDE COUNTY PLANNING DEPARTMENT



Robert C. Johnson, Planning Director

Y:\TM2KBROWNE\DER Log\RespLtrs\#2004 Riverside GP_EIR.doc

6. Robert C. Johnson, Planning Director, Planning Department, Transportation and Land Management Agency, County of Riverside. December 27, 2004.

Response 6-1

The comment cites appropriate reasons for preparing a Program EIR. This Program EIR has been prepared for the General Plan program consistent with the objectives cited. The comment also describes the Project area examined in the Program EIR.

Response 6-2

As noted in the introductory paragraphs of these Responses to Comments, subsequent to preparation of the Draft Program EIR, the Riverside City Council determined that reduction of the Sphere of Influence area will not be pursued at this time and specifically as not part of this Project. Therefore, references to a planned Sphere of Influence reduction are stricken from the Program EIR.

Response 6-3

The comment correctly notes that until such time the City of Riverside annexes properties within its Sphere of Influence, Riverside County has jurisdiction over these lands. Also as noted, the Memorandum of Understanding provides for coordination between the City and County. As this comment does not address any environmental issue, no further response is necessary.

Response 6-4

The comment indicates that City land use designations within the Sphere of Influence do not reflect approved County plans for the area nor recently adopted land use designations, and that this inconsistency may underreport and analyze incorrectly cumulative Project impacts.

The City has elected to assign lower intensity land use designations within its Sphere area than current County plans provide, consistent with overall City objectives for outlying areas. The thrust of the updated General Plan is to concentrate new development as infill within the established City framework, applying smart growth principles and reducing greenfields development, as such a development approach has the ability to reduce overall impacts. However, the City also recognizes that the County may continue to approve more conventional subdivision developments within the Sphere and has accounted for this in the regional SCAG traffic model used for the General Plan EIR. As such, traffic, air quality, and noise impacts in this area account for County plans.

Response 6-5

As described on page 6-1 of the Draft Program EIR, Section 15130 of the CEQA Guidelines allows for the analysis of cumulative project impacts to consider lists of approved and proposed projects, or programmatic-level regional projections. Given the scope of the Project and the long-term character of its implementation, the Program EIR incorporates the

latter approach. The regional traffic model accounts for growth within the SCAG region, which includes adjacent San Bernardino County, and thus accounts for any such traffic impacts on local infrastructure.

Response 6-6

The air quality analysis in the EIR is based upon the current cumulative trip volumes and future projected cumulative trip volumes reported in the traffic study (Appendix H of the Program EIR). The trip generation rates used in the traffic study were drawn from the SCAG regional model. The URBEMIS program used to calculate air pollutant emissions uses trip generation default values that frequently require modification to match specific project scenarios. In this case, to achieve consistency with traffic study projections, the default values were modified to allow for a match to the cumulative current and future trip generation estimates presented in the traffic study.

Response 6-7

This comment addresses a land use issue but does raise any question about analysis in the Draft Program EIR. Thus, no response is necessary.

Response 6-8

This comment addresses a land use issue but does raise any question about analysis in the Draft Program EIR. Thus, no response is necessary.

Response 6-9

City policy set forth in the General Plan is to continue the low intensity land use designations within the Sphere. Entitlements granted by the County, until such time development of entitled sites actually occurs, do not change existing use of such properties, and such entitlements can expire if not pursued. If properties are developed pursuant to such entitlements, the City will reexamine land use policy for affected areas.

Response 6-10

As noted, property owners have the option of withdrawing from Williamson Act contracts by filing a Notice of Nonrenewal. The filing provides the property owner with an additional ten years of agricultural tax credits, after which the property attains nonagricultural status. Alternatively, when filing the Notice, a property owner can elect to pay a higher tax rate to allow for nonagricultural use at a time before the ten years passes. The filings of Notices of Nonrenewal cited in the comment indicate owners' possible intentions to cease agricultural use of properties formerly under Williamson Act contracts. However, such land owners will continue to be subject to General Plan and zoning regulations applicable to those properties irrespective of the agricultural preserve status.

Response 6-11

The estimate of current population is based upon State Department of Finance data for the City (Draft EIR, p. 5.12.-1). The population projections are based upon the land use

designations in the City's Draft General Plan, the acres of land within these designations, and an assumed average household size.

Response 6-12

The build-out projections incorporate both existing development in the Planning Area and new development that will occur on vacant properties and as sites redevelop over the 20-year planning period of the General Plan. The maximum allowable densities were not assumed because many existing developments are not built to these maximums, and physical and other constraints on other properties will prevent maximums from being achieved. To assume the maximum densities would grossly overstate existing and potential future development levels. Instead, the analysis assumes average densities that are based upon observed past development practices. Table FEIR-1 on the following page presents the assumptions used to project future development levels.

Response 6-13

As part of its development review process, the City has the discretion to determine whether a project qualifies for a CEQA Categorical Exemption. The City agrees that the infill exemption may not be appropriate for any number of mixed-use or infill development applications filed in the future. The City will examine each application critically to determine the level of CEQA review required.

Response 6-14

Per Section 15126.6 of the CEQA Guidelines, the Draft Program EIR examines alternatives which "would feasibly attain most of the basic objectives of the project, but would avoid or substantially lessen any of the significant effects of the project, and evaluate comparative merits of the alternatives." Given that the County's land use designations for the area allow for a higher intensity of use than proposed City policy, and given that such higher intensity would result in greater traffic, air quality, public service (library), and noise impacts than would the Project, such an alternative would not work to reduce significant impacts of the Project. Thus, the alternative was not examined in the Draft EIR.

Response 6-15

The comment states that the General Plan policies presented in the Draft Program EIR as measures that will avoid or reduce impacts are not legally enforceable mitigation measures. The EIR does not present the policies as measures required to mitigate impacts. Rather, the analysis indicates that the long-term implementation of policies will avoid impact or ensure a less than significant impact. This approach reflects the programmatic nature of the Project and the EIR. Where follow-up policy actions cannot be clearly identified, the EIR includes mitigation measures. All General Plan policies will be part of the General Plan Implementation Plan required by State law (Government Code Section 65400), and in the Implementation Plan, the City will identify for each policy one or more strategies, termed "tools", that the City will pursue over the long term to implement that policy. In addition to identifying the tools, the Implementation Plan will indicate which City agency will be responsible for effectuating the policy, the funding source and potential cost, and the time frame to complete action (which could be ongoing over the life of the General Plan). As part of both the annual budgeting process and annual review of the General Plan, City

department staff and decision makers – and the public and other public agencies through the public hearing process – will determine whether particular policies have already been implemented and which require action over the upcoming year. This process will allow decision makers and the public to check and ensure implementation on an annual basis. Given the programmatic nature of the EIR and the long-term time frame for the General Plan, the policy statements and Implementation Plan serve as effective and appropriate means of addressing any potential impacts.

TABLE FEIR-1
PROJECTED LAND USE - GENERAL PLAN

						Net			Estimated			Non-Residential			Estimated		
		Assumptions				Acres			Dwelling Units / Households			Square Feet (Thousands)			Population		
		Maximum		Average													
		DU/Acre	FAR	DU/Acre	FAR	City	Sphere	Total	City	Sphere	Total	City	Sphere	Total	City	Sphere	Total
Residential Land Uses																	
A/RR	Agricultural/Rural Residential	0.20		0.20		5,115	10,080	15,195	1,023	2,016	3,039	0	0	0	2,993	5,898	8,890
HR	Hillside Residential	0.63		0.50		4,053	5,474	9,526	2,026	2,737	4,763	0	0	0	5,928	8,006	13,934
SRR	Semi-Rural Residential	2.50		1.50		1,273	36	1,309	1,909	54	1,964	0	0	0	5,586	159	5,745
VLDR	Very Low Density Residential	2.50		1.50		1,260	3,011	4,271	1,890	4,516	6,406	0	0	0	5,529	13,210	18,739
LDR	Low Density Residential	5.00		3		2,414	508	2,921	7,241	1,523	8,764	0	0	0	21,183	4,455	25,637
MDR	Medium Density Residential *	6.50		5.5		10,703	474	11,177	58,867	2,609	61,476	0	0	0	172,203	7,632	179,835
MHDR	Medium High Density Residential	15.00		12		748	0	748	8,973	0	8,973	0	0	0	26,248	0	26,248
HDR	High Density Residential	25.00		20		823	0	823	16,470	0	16,470	0	0	0	48,179	0	48,179
VHDR	Very High Density Residential	40.00		30		108	0	108	3,254	0	3,254	0	0	0	9,518	0	9,518
Commercial Land Uses																	
C	Commercial		0.35		0.25	1,367	221	1,587	0	0	0	14,882	2,402	17,284	0	0	0
CRC	Commercial-Regional Center		0.50		0.25	224	0	224	0	0	0	2,442	0	2,442	0	0	0
O	Office		1.00		0.65	368	0	368	0	0	0	10,425	0	10,425	0	0	0
B/OP	Business/Office Park		1.50		0.40	4,000	154	4,154	0	0	0	69,693	2,682	72,375	0	0	0
I	Industrial		0.60		0.40	392	80	472	0	0	0	6,822	1,398	8,220	0	0	0
Mixed Land Uses																	
MU-N	Mixed Use-Neighborhood	10	1	5	0.35	69	0	69	103	0	103	736	0	736	302	0	302
MU-V	Mixed Use-Village	30	2.5	20	1.00	513	0	513	5,132	0	5,132	11,176	0	11,176	15,011	0	15,011
MU-U	Mixed Use-Urban	40	4	30	2.00	235	0	235	4,930	0	4,930	6,136	0	6,136	14,422	0	14,422
Community Amenities and Support																	
A	Agricultural		N/A			0	2,404	2,404	0	0	0	0	0	0	0	0	0
P	Public Park		N/A			3,188	1,106	4,294	0	0	0	0	0	0	0	0	0
PR	Private Recreation		N/A			719	0	719	0	0	0	0	0	0	0	0	0
OS	Open Space/Natural Resources		N/A			1,096	3,011	4,107	0	0	0	0	0	0	0	0	0
PF	Public Facilities and Institutional		1.00		0.20	3,930	28	3,959	0	0	0	34,242	245	34,487	0	0	0
RAT	Kangaroo Rat Habitat		N/A			0	7,251	7,251	0	0	0	0	0	0	0	0	0
Downtown Specific Plan																	
DSP	Downtown Specific Plan		Various			434	0	434	3,364	0	3,364	4,310	0	4,310	9,841	0	9,841
	TOTAL					43,033	33,837	76,870	115,182	13,455	125,273	160,864	6,727	167,590	336,942	39,360	376,302
	2003 DOF Estimates								90,511						274,071		
	% Increase								+ 27%						+ 23%		

* Maximum 8.0 DUs Per Acre Allowed With Planned Residential Development
Assumptions
3.067 Persons Per Household (per DOF 2003)
4.62% Residential Vacancy Rate (per DOF 2003)



DIVISION OF OIL,
GAS, & GEOTHERMAL
RESOURCES

■ ■ ■

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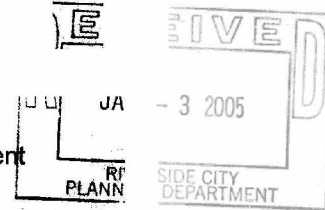
ARNOLD
SCHWARZENEGGER
GOVERNOR

LETTER 7

DEPARTMENT OF CONSERVATION
STATE OF CALIFORNIA

December 28, 2004

Mr. Craig Aaron, Principal Planner
City of Riverside, Planning Department
3900 Main Street, 3rd Floor
Riverside, California 92522



Subject: Notice of Preparation for a Draft Environmental Impact Report for City of Riverside General Plan, Zoning Code, Subdivision Code, Citywide Design Guidelines and Magnolia Avenue Specific Plan, SCH# 2004021108

Dear Mr. Aaron:

The Department of Conservation's (Department) Division of Oil, Gas, and Geothermal Resources (Division) has reviewed the above referenced project. The Division supervises the drilling, maintenance, and plugging and abandonment of oil, gas, and geothermal wells in California.

The proposed project is located beyond the administrative boundaries of any oil or gas field. There are no oil, gas, or injection wells within the boundaries of the project. However, if excavation or grading operations uncovers a previously unrecorded well, the Division district office in Cypress must be notified, as the discovery of any unrecorded well may require remedial operations.

Building over or in the proximity of plugged and abandoned wells should be avoided if at all possible. If this is not possible, it may be necessary to plug or re-plug wells to current Division specifications. Also, the State Oil and Gas Supervisor is authorized to order the reabandonment of previously plugged and abandoned wells when construction over or in the proximity of wells could result in a hazard (Section 3208.1 of the Public Resources Code). If reabandonment is necessary, the cost of operations is the responsibility of the owner of the property upon which the structure will be located. Finally, if construction over an abandoned well is unavoidable an adequate gas venting system should be placed over the well.

To ensure proper review of building projects, the Division has published an informational packet entitled, "Construction Project Site Review and Well Abandonment Procedure" that outlines the information a project developer must submit to the Division for review. Developers should contact the Division's Cypress district office for a copy of the site-review packet. The local planning department should verify that final building plans have undergone Division review prior to the start of construction.

7-1

Mr. Craig Aaron, Principal Planner
December 28, 2004
Page 2

Thank you for the opportunity to comment on the Notice of Preparation for the Draft Environmental Impact Report. If you have questions on our comments, or require technical assistance or information, please call me at the Cypress district office: 5816 Corporate Avenue, Suite 200, Cypress, CA 90630-4731; phone (714) 816-6847.

7-1

Sincerely,



Paul Frost
Associate Oil & Gas Engineer

7. Paul Frost, Associate Oil and Gas Engineer, Division of Oil, Gas, and Geothermal Resources, Department of Conservation, State of California. December 28, 2004.

Response 7-1

The comment states that no oil, gas or injection wells exist within the boundaries of the Project and if any excavation or grading operations uncover a previously unrecorded well, the Division of Oil, Gas, and Geothermal Resources should be notified. Because the EIR addresses the entire City, no “project site” in the usual context in which the Department of Conservation reviews a proposal exists. Rather, the information is addressed on a citywide basis.

The Project is the adoption and implementation of the updated General Plan, Zoning Code, Subdivision Code, Citywide Design Guidelines and Magnolia Avenue Specific Plan. These documents will be used to guide future development and growth in the Riverside Planning Area and do not propose specific development projects. Individual development projects pursuant to the adoption and implementation of the Project will be required to evaluate if the conditions at a specific project site pose a threat to human health or the environment in accordance with the City’s standard CEQA and project review processes.

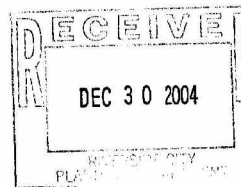
LETTER 8



SAN GORGONIO CHAPTER

4079 Mission Inn Avenue, Riverside, CA 92501 (951) 684-6203
Membership/Outings (951) 686-6112 Fax (951) 684-6172

*Regional Groups Serving Riverside and San Bernardino Counties: Big Bear,
Los Serranos, Mojave, Moreno Valley, Mountains, Tahquitz.*



December 30, 2004

Craig Aaron
Principal Planner
City of Riverside
3900 Main Street
Riverside, CA 92522

RE: GENERAL PLAN DRAFT ENVIRONMENTAL IMPACT REPORT COMMENTS

Dear Mr. Aaron:

We appreciate this opportunity to express a few concerns regarding the Draft Environmental Impact Report (DEIS). We, however, do not appear to be on your contact list for projects and hope this to be the last such oversight.

8-1

The Sierra Club is very concerned about the City's plan to expand towards Lake Elsinore. This simply appears to be an effort to have the proposed new "Midcounty Parkway" within the City.

The Final Environmental Impact Report (FEIS) will be inadequate unless it analyzes the difference on impacts to the Lake Matthews Stevens Kangaroo Rat (SKR) /Multispecies Reserve between the surrounding lands in the City and in the County. Because the City has done a very poor job of using the tens of thousands of dollars set aside for the Sycamore Canyon Park SKR Reserve, the FEIR must show how the General Plan will benefit the management of both SKR Reserves.

8-2

The arroyos in our City are an important resource for both open space and habitat/linkages. The FEIR will be inadequate unless any proposed projects are fully analyzed with special emphasis on cumulative impacts on biological resources.

8-3

The FEIR must ensure Environmental Justice, which includes maintaining the integrity of Casa Blanca. How will the General Plan impact this special area of Riverside? After build out, how will you insure it will serve the same purpose it does today? Are there any roadways/"parkways" which could impact or split this community? What would be the growth-inducing and/or cumulative impacts of such projects?

8-4

A major concern of Riverside County residents during public hearings on the Riverside County General Plan was maintaining separation between communities/cities. How will the proposed General Plan foster this separation between Riverside and the cities of Perris and Corona? Since

8-5

the Southern California Association of Governments is concerned about the City maintaining lands devoted to agriculture, how will this General Plan accomplish no net loss? What will the loss actually be if you include the proposed expansion of the city limits – at build out? 8-6

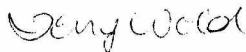
How will the City maintain a level of service of C or D at peak times? What street/ transportation modifications and requirements will be implemented to accommodate the proposed higher density – especially in downtown areas? What will the Level Of Service (LOS) be during the peak traffic times at build out within two miles of each firestation and emergency room? All of the circulation maps need to have all schools, firestations and emergency rooms clearly marked. What has been done to keep major transportation corridors away from children and schools – such as Alcott Elementary and Poly High School? What will the impacts be from PM 10 and PM 2.5 on the school children? Which schools will suffer the greatest impact? All schools should be listed in order of impacts now and at the General Plan build out. What inconsistencies exist between the road improvements listed under Measure A passed by Riverside County voters and the proposed General Plan Circulation Element? The FEIR will be inadequate unless these differences are all listed. The growth-inducing and cumulative impacts caused by these differences represented by Measure A improvements must be fully analyzed, or the FEIR will be considered inadequate. 8-7

8-8

8-9

Please notify the Sierra Club of all future meetings in a timely manner. Hard copies of all future documents should be provided to us so that we can easily understand your charts and maps.

Sincerely,



Terry Wold
Conservation Program Coordinator

Printed on Recycled Paper

8. Terry Wold, Conservation Program Coordinator, Sierra Club, San Geronio Chapter. December 30, 2004.

Response 8-1

These comments are introductory in nature and require no direct response. However, the comment suggests that the Midcounty Parkway project is proposed by the City of Riverside when, in fact, it is being studied by the Riverside County Transportation Commission (RCTC), the agency responsible for transportation planning in Riverside County and the administrator of Measure A, Riverside County's 0.5¢ sales tax for transportation. The Midcounty Parkway is a proposed 32-mile east-west limited access route for western Riverside County to relieve congestion, improve safety and help address future traffic demands. The route will connect the San Jacinto area with the Corona area. Since no specific route has been selected for the Midcounty Parkway, the extent of impact specific to the City of Riverside is not known. However, the City's General Plan and the analysis in the EIR assume future existence of the roadway, and in particular, the traffic analysis accounts for this roadway as an arterial or higher classification roadway at a location approximate to current Cajalco Road.

Per the commentor's request, the commentor will be placed on the Project's distribution list for future meetings.

Response 8-2

The comment suggests that the Final EIR analyze the Project's impacts to the Lake Matthews Stevens Kangaroo Rat Multi-species Reserve and surrounding lands in the Planning Area in comparison with impacts in the County. As stated in the Draft EIR on page 5.9-19, the Lake Mathews Multi-Species Habitat Conservation Plan (MSHCP) area is proposed to be expanded, and a constrained linkage is proposed to connect the Lake Mathews core to an existing channel located west of the I-15 corridor, which will provide a through linkage to the Santa Ana River core area, as designated in the City's General Plan Land Use Element. The Sycamore Canyon Park area of the MSHCP is designated as Public Park, and the MSHCP core area around Lake Mathews is designated for Kangaroo Rat Habitat and Agricultural/Rural Residential land uses (Figure 5-17) to preserve their biological value and serve as a management tool to maintain the land.

Objectives and policies in the General Plan establish protections in these conservation areas, as stated in the Draft EIR on page 5.4-26. Specifically, Policy OS-5.3 contributes to the protection of this critical resource area by requiring the City to implement the following:

"Continue to participate in the Steven's Kangaroo Rat (SKR) Habitat Conservation Plan including collection of mitigation fees and operation of Sycamore Canyon Wilderness Park as an SKR reserve."

Policy OS-6.4 also promotes the preservation of Sycamore Canyon Wilderness Park through implementation of the following:

“Continue with efforts to establish wildlife movement corridor between Sycamore Canyon Wilderness Park and the Box Springs Mountain Regional Park as shown on the MSHCP. New developments in the area shall be conditioned to provide for the corridor and Caltrans shall be encouraged to provide an underpass to the 60/215 Freeway.”

The Project will not interfere with nor hinder the preservation of either the Lake Matthews or Sycamore Canyon Wildlife Park preservation areas. Additionally, impacts associated with individual development projects will be assessed on a project-by-project basis in accordance with CEQA provisions (p. 5.4-26)

The City is committed to long-term preservation of sensitive habitats and species, as demonstrated in its participation in the MSHCP and statement of objectives and policies in the General Plan.

Response 8-3

The comment suggests that the Final EIR analyze any proposed project for cumulative impacts on biological resources and impacts to the City’s arroyos. Objectives and policies in the General Plan establish protections for arroyo areas. Policy OS-6.3 preserves the integrity of Riverside’s arroyos and riparian habitat areas (page 5.9-20), and Policy LU-7.3 requires natural open space easements in conjunction with new development in hillside and arroyo areas (page 5.9-21). These specific policies directly protect the arroyos in the City. Also, the Land Use Policy Map designates the arroyos as open space resources to be protected when development proposals are put forward that affect these resources.

Proposition R and Measure C apply to the greenbelt area that encompass key arroyos, and implementation of zoning and grading regulations adopted pursuant to these voter-initiated measures work to protect the arroyos on a comprehensive basis.

As stated in Section 6.0, Analysis of Long-Term Effects, the General Plan Land Use and Urban Design Element and Open Space and Conservation Element include numerous objectives and policies designed to reduce impacts on biological resources over the long term. With adherence to and implementation of General Plan policies, the Project’s cumulative biological resources impacts will be less than significant (page 6-5). Additionally, the cumulative impact of individual development projects upon biological resources will be assessed on a project-by-project basis per CEQA requirements.

Response 8-4

The comment suggests that the Final EIR analyze environmental justice impacts associated with implementation of the General Plan on the community of Casa Blanca and whether roadways split the community. Although not specifically stated, the inference is that any extension of Overlook Parkway and associated connections to SR-91 should respect this neighborhood.

The General Plan indicates that the Overlook Parkway extension and associated connections will be subject to a specific plan study to ensure that the improvements balance the City’s circulation goals with other goals to respect the integrity of neighborhoods. These considerations will be applied in such future study to ensure that the Casa Blanca neighborhood is not inequitably impacted. Policies in the General Plan specific

to the Casa Blanca neighborhood recognize its historic significance to Riverside as a whole and the Latino community in particular.

Response 8-5

The commentor is concerned that the General Plan encourages the separation between Riverside and the adjacent cities of Perris and Corona. Specific ideas in this regard are not stated. No policies in the General Plan address this issue in any manner. Generally, policies encourage cooperation with surrounding jurisdictions to address regional concerns, especially traffic. The comment does not raise any specific concern regarding analysis in the EIR with respect to this issue.

Response 8-6

The comment questions how the City plans to maintain agricultural lands with no net loss in acreage. As stated in the Draft EIR on page 5.2-5, the Project will not directly convert Farmland to non-agricultural use, even though it is possible that development of dwelling units and non-residential areas may indirectly impact agricultural areas. Both the General Plan and the Zoning Code retain Agricultural land use designations, and no land previously designated for agriculture has been redesignated for an alternative use. Consistent with voter-approved Proposition R and Measure C, policies maintain large-acreage uses in the greenbelt area and near southern sphere. To prevent indirect impacts on agricultural resources, the Project includes policies and tools that will retain, protect, and encourage agricultural land use with no direct loss of agricultural land.

Response 8-7

The comment questions how the City will maintain acceptable levels of service at peak times and asks which transportation system modifications will be implemented to accommodate population growth. As stated in page 5.15-62, Project implementation will facilitate new growth that will generate additional roadway traffic. The Draft EIR shows that several roadway segments, including roadways in the downtown area, are projected to operate at LOS E or F at Project buildout, as shown in Figure 5-40 (2025 Volume to Capacity Ratio) on page 5.15-35. The Project assumed a series of roadway widenings, intersection improvements, and other measures deemed reasonably foreseeable within the life of the Project to address long-term impacts. Even with all of these long-term improvements, several roadway linkages will operate at unacceptable levels of service at Project buildout.

To address impacts to these roadway linkages, mitigation measure T-1 is required, which requires the City to monitor traffic levels on a continual basis and to identify any potential additional intersection and roadway improvements that would improve localized LOS. The measure requires the City to implement all such improvement deemed feasible. Additionally, the Circulation and Community Mobility Element makes the following statement regarding LOS:

The City will strive to maintain LOS D or better on arterial streets wherever possible. At some key locations, such as City arterial roadways which are used as a freeway bypass by regional through traffic and at heavily traveled freeway interchanges, LOS E may be acceptable as determined on a case-by-case basis. Locations that may

warrant the LOS E standard include portions of Arlington Avenue/Alessandro Boulevard, Van Buren Boulevard throughout the City, portions of La Sierra Avenue and selected freeway interchanges (p. 5.15-37 of Draft EIR and p. CCM-13 of General Plan).

The comment also suggests that the Draft EIR include circulation maps indicating the levels of service during peak hours for all transportation corridors within two miles of fire stations and emergency rooms. Further, the comment requests that an exhibit be included to show all transportation corridors within two miles of all schools, fire stations, and emergency rooms in the Planning Area. The levels of service for all major roadway segments in the Planning Area are shown on Figure 5-38 (2025 Intersection Peak Hour Conditions) on page 5-15-25 and Figure 5-40 (2025 Volume to Capacity Ratio) on page 5.15-35. The information requested in the comment can be inferred from materials presented in the EIR.

Response 8-8

The comment suggests that the Draft EIR analyze air quality impacts from PM_{10} and $PM_{2.5}$ exposure on school children within the Planning Area. As stated on page 5.3-7 in Section 5.3, Air Quality, children are included in a group of receptors that are most sensitive to PM_{10} emissions. School hours are typically between the morning and afternoon peak-hour traffic conditions, thereby lessening traffic and PM_{10} and $PM_{2.5}$ impacts on school children. Additionally, with implementation of the identified policies in the General Plan Air Quality Element and mitigation measures AQ-1 through AQ-7, particulate matter air quality impacts will be substantially lessened. However, the degree to which these measures will reduce PM_{10} emissions cannot be quantified. As stated on page 5.3-26 of the Draft EIR, air pollutants levels of PM_{10} are expected to continue to exceed the SCAQMD threshold criteria for significance. Impact associated with PM_{10} emissions is significant and unavoidable, and a Statement of Overriding Considerations will be prepared. By adopting the Statement, the City Council has determined that these impacts were acceptable because of specific overriding considerations.

As growth occurs throughout the Planning Area, individual development projects will be constructed to accommodate both existing and planned development. As this is a first-tier, Program EIR, CEQA analysis of air quality impacts of major construction projects, including roadway improvements adjacent to schools, may be properly deferred until plans for such specific facilities are developed.

Response 8-9

The comment suggests that any inconsistencies with the Circulation and Community Mobility Element of the General Plan and Riverside County's Measure A improvements be analyzed in the Final EIR. Since Measure A was adopted by voters, the Circulation and Community Mobility Element takes into account all of Measure A planned traffic improvements. No inconsistencies result from implementation of the General Plan.

LETTER 9

December 30, 2004

To: Ms. Diane L. Jenkins

Re: **Comments to City of Riverside General Plan Draft EIR, RCTC Measure A, and Central Avenue near Sierra Middle School**

I appreciate this opportunity to express my concerns and to convey some concerns of over 1,000 parents of Sierra Middle School Students. While it appears the Proposed Circulation element of the General Plan is maintaining four lanes and an 88-foot ROW, we are concerned that the "new Measure A" has other visions, ones which must have been supported by the City of Riverside.

Although Sierra is a two-year school, and the children of parents who signed this petition will probably be out of college before improvements are even begun, we feel we must speak for the children of the future. Their health and safety is as important as that of today's students. 9-1

Because the General Plan indicates a ROW of at least 100 feet from Alessandro Blvd. to Highway 91 (and actually to the Plaza), it cause us great concern – concern which seems to be validated by the attached flyer from RCTC about the Central Avenue Arterial and the plan for future improvement.

I believe the final EIR will be inadequate unless all schools, public and private, are easily recognized on all circulation and hazard maps. I also believe PM 2.5 and PM 10 emissions impacts on children at schools need to be fully analyzed for the ultimate build-out of the General Plan. The Final EIR will be considered inadequate unless it shows how the impact of PM 2.5 and PM 10 on children is lessened by restricting vehicles exceeding 10,000 pounds except for deliveries on roadways within 1,000 feet of schools. Even the State of California has begun to recognize the health hazards to children that are caused by siting schools too close to arterials and freeways. 9-2

We support Central Avenue maintaining its present designation, but we realize that this will ultimately change unless the City becomes proactive in rescinding RCTC's designation for future improvements to Central Avenue. This should not be left to a future City Council and Planning Commission, but should be taken up in 2005. 9-3

Please keep me informed of future documents and meetings regarding the General Plan by contacting me at the address below. Also keep me informed of your efforts with RCTC to have Central Avenue removed from its list of planned improved arterials. 9-4

Sincerely,



George Hague
4950 Central Avenue
Riverside, California 92504



New Measure A

2002-2003
School year

Traffic congestion relief for Riverside...

Please support over 800 parents and staff members. Direct staff to be involved in Riverside's General Plan on behalf of the health and safety of our children. With a rich 120-year history, Riverside has evolved through the years from a quiet agricultural area into a dynamic, active city and a center of higher education, technology, commerce, law, finance and culture.

The city's transportation system features the 60, 91 and 215 freeways and many regional arterial streets such as Van Buren and Alessandro Boulevards. A range of transportation projects that serve your community's interests are included in the New Measure A:

Highways and Arterials

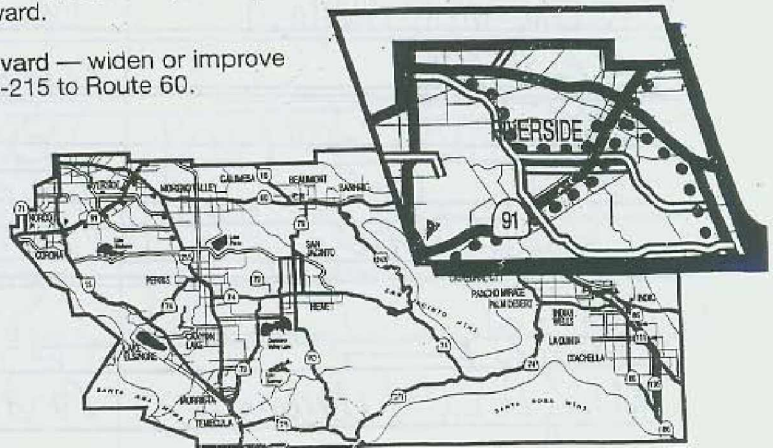
- ▶ Route 91 — new lane in each direction from Pierce Street in Riverside to the Orange County line.
- ▶ I-215 — two new lanes in each direction from the 60/91/I-215 interchange to the San Bernardino County line.
- ▶ Route 71 — widen to three lanes in each direction from Route 91 to the San Bernardino County line.
- ▶ I-15/91 Interchange — new northbound I-15 to westbound 91 connector ramp.
- ▶ 91/71 Interchange — improve traffic flow between Routes 91 and 71.
- ▶ Alessandro Boulevard — widen or improve operations from I-215 to Central Avenue.
- ▶ *Central Avenue — widen or improve operations from Alessandro Boulevard to Van Buren Boulevard.
- ▶ Arlington Avenue — widen or improve operations from Central Avenue to Van Buren Boulevard.
- ▶ Van Buren Boulevard — widen or improve operations from I-215 to Route 60.

No
Diesel Trucks
in the section
where our children
walk!

New Measure A

Completed by 2039

Freeways/Highways
Major Arterials
Commuter Rail
Interchange
Local Street and
Road Improvements



9. George Hague, Resident. December 30, 2004.

This letter included a petition, which is included as part of this Volume III in Appendix B.

Response 9-1

These comments reflect the opinion of the commentor and require no direct response.

Response 9-2

The comment suggests that the Final EIR analyze air quality impacts from PM₁₀ and PM_{2.5} exposure on school children in the Planning Area. As stated in Response 5-8, school hours outside of peak traffic conditions and implementation of the identified policies in the General Plan Air Quality Element and mitigation measures AQ-1 through AQ-7 result in the reduction of particulate matter air quality impacts.

With regard to the comment that the City restrict all vehicles exceeding 10,000 pounds, except for trucks making deliveries, on roadways within 1,000 feet of schools, the City notes that it has designated truck routes that focus truck traffic on Arterials. Such routes largely avoid schools. Also, trucks of this size generally service industrial areas, which General Plan land use policy groups into clusters largely separate from residential neighborhoods and the schools that serve them.

The comment also suggests that the Final EIR include an exhibit showing all schools on every circulation and hazard map for the Project. The General Plan includes adequate policies to address land use compatibility concerns, and the City does not believe that the maps requested will provide any additional policy direction for land use planning purposes.

Response 9-3

The comment suggests that the City maintain Central Avenue's present roadway classification and deny the RCTC's plan for future improvements to Central Avenue. The improvements planned for Central Avenue are proposed because the roadway is currently experiencing traffic delays. The Master Plan of Roadways provides for Central Avenue between I-215 and Chicago Avenue to terminate at Chicago Avenue; not extension via Fairview Avenue is planned. Any future widening of Central Avenue from Alessandro Boulevard north – within existing right-of-way – will help alleviate traffic congestion, thereby decreasing the amount of pollution experienced along Central Avenue.

As stated in Response 5-1, the Riverside County Transportation Commission (RCTC) is the agency responsible for transportation planning in Riverside County and the administrator of Measure A. The City of Riverside will work with the RCTC once final plans are initiated. Further, the final scope and project limits of all improvements proposed under Measure A, including improvements to Central Avenue, will be determined through noticed public hearings, environmental clearance process, and agreement with affected agencies.¹ As this

¹ Riverside County Transportation Commission. Transportation Expenditure Plan and Retail Transaction and Use Tax Ordinance No. 02-001, <http://www.rctc.org/measureA/pdf/2002MeasureA.pdf>.

is a first-tier, Program EIR, CEQA analysis of any Central Avenue improvements may be properly deferred until plans for the facility are developed by RCTC.

Response 9-4

Per the commentor's request, the commentor will be placed on the Project's distribution list for future meetings. No other response is required.

LETTER 10

January 3, 2005
To: Craig Aaron, Principal Planner
City of Riverside, Planning and Building Department
3900 Main Street, 3rd Floor
Riverside, CA 92522



From: Friends of Riverside's Hills

Re: Comments on Draft Environmental Impact Report ("DEIR") for the
General Plan 2025 Program (the "Project") for the City of Riverside

The Project represents a major effort encompassing many changes, some of them commendable, to the City's current General Plan, and Zoning and Subdivision Codes. However, some of the proposed changes have negative environmental impacts which need to be analyzed and avoided or mitigated. We refer in particular to changes in the Zoning Code, such as those allowing flag lots and weakening conditions on density for PRDs in the RC zone, which constitute amendments to the voter-passed Measures R and C, and thus are illegal without a vote of the people, as well as having negative environmental impact. In addition, the DEIR is deficient in other respects, including failure to consider appropriate alternatives, failure to adequately analyze negative impacts, and failure to propose adequate mitigation measures some of which are readily available. The comments below are comments for the environmental review of all aspects of the Project, including the proposed new Zoning and other Codes. In various places statements are made to the effect that the General Plan policies or other recommendations relied upon in the EIR should be adopted as legally enforceable mitigation measures; similar wording is meant to apply to other comments made below, even in cases where it is not explicitly stated.

10-1

DEIR Section 5.1 Scenic Vistas

The DEIR relies upon General Plan policies to mitigate scenic impacts. These policies are not legally enforceable. **The General Plan policies relied upon in the EIR should be adopted as legally enforceable mitigation measures.**

10-2

DEIR Section 5.2 Agricultural Resources

The DEIR relies upon General Plan policies to mitigate agricultural resource impacts. These policies are not legally enforceable. **The General Plan policies relied upon in the EIR should be adopted as legally enforceable mitigation measures.**

10-3

DEIR Section 5.3 Air Quality

p. 5.3-13

"SCAQMD Regulations

Fugitive Dust: Rule 403 is an existing AQMD regulation that requires watering and other actions to reduce the amount of fugitive dust particles released into the air due to grading, construction, demolition and other activities."

10-1

AQMD Rule 403, as amended in April, 2004, prohibits (except in certain exceptional circumstances) the use of disking for weed abatement for fire control purposes, and instead allows mowing provided that 3 inches of vegetation are left standing. (Even in the exceptional circumstances when disking is allowed, the land must be watered during and frequently after the disking, which is prohibitively expensive.) The City has been breaking this law, and encouraging private citizens to do so: in its maintenance of undeveloped parks it continues to disk (as at Mt. Vernon park; Islander Park is a recent exception because of neighborhood protest, but even there the mowing is too low, scraping the ground), and it continues to have its contractors disk land for weed abatement that the owners have not cleared. Moreover, its weed abatement notices fail to inform landowners of the present law that effectively bans disking. The City can help with air quality PM10 mitigation by itself following AQMD Rule 403 and seeing that those doing weed abatement also abide by Rule 403. Moreover, by discouraging disking, the City would also discourage illegal grading (often on environmentally sensitive sites) done in the guise of weed abatement for fire control, which has been a problem in the City.

The City should adopt the following mitigation measures:

- Disking for fire control is prohibited. Fire control shall only be accomplished by mowing, to a minimum height of three inches.
- Any notification to property owners of the need for weed abatement shall contain a notice of the no disking requirement.
- Any property on which illegal disking has occurred shall be required to re-seed with native vegetation within 30 days after disking and shall be required to water until the native vegetation has been adequately reestablished.
- Any property on which illegal grading has occurred shall be required to re-seed with native vegetation within 30 days after grading and shall be required to water until the native vegetation has been adequately reestablished.
- The City and all of its departments shall conduct weed abatement only by mowing to a minimum height of three inches.
- The City shall establish fines for violation of the no disking requirement of not less than \$500.00 for the first offense and not less than \$1,000.00 for each subsequent offense. Any willful violation, defined as disking after receiving notice of the anti-disking requirements shall be subject to a minimum fine of \$5,000.00.
- The City shall establish fines for illegal grading of not less than \$500.00 per acre for the first offense and not less than \$1,000.00 per acre for each subsequent offense.

10-4

Other Air Quality mitigation measures that should be adopted include:

- All warehouses of over 90,000 square feet of gross area shall provide electrical hookups at the loading docks so that refrigerated tractor trailer units can hook up to electrical power and shut down diesel powered units.
- All proposed warehouse facilities of over 90,000 square feet shall conduct a toxic air contaminants study for diesel emissions of the project and the project combined with all cumulative projects, prior to acceptance of the application as being complete.

10-5

<ul style="list-style-type: none"> All proposed projects that are expected to employ more than 100 persons shall be required to submit a Trip Reduction Plan prior to the application being deemed to be complete. All development projects shall be required to mitigate a minimum of 80% of PM₁₀ construction emissions. 	10-6
<p>The EIR relies upon the policies of the General Plan to mitigate air quality impacts. These measures are not legally enforceable. The General Plan policies relied upon in the EIR should be adopted as legally enforceable mitigation measures.</p>	10-7
<p>DEIR Section 5.4 Biological Resources</p> <p>The EIR relies upon the policies of the General Plan to mitigate biological resource impacts. These measures are not legally enforceable. The General Plan policies relied upon in the EIR should be adopted as legally enforceable mitigation measures.</p>	10-8
<p>In addition, the following mitigation measures should be adopted:</p> <ul style="list-style-type: none"> For any project on property with an identified blue line stream, a wetlands delineation study must be reviewed and approved by the applicable resource agency prior to deeming the application for a development project complete. Any development proposal for over five acres in size shall provide a detailed biological assessment including an assessment of all biological resources, including habitat and potential wildlife corridors, that identifies all rare, threatened and endangered species as well as all species of special concern and all rare plant materials and including mitigation proposals prior to the application being deemed to be complete. 	10-9
<ul style="list-style-type: none"> Development, including associated grading, shall not be permitted within the arroyos and tributaries identified in accordance with Measures R and C, nor within 50 foot setbacks from said arroyos and tributaries. 	10-10
<p>DEIR Section 5.5 Cultural Resources</p> <p>The EIR relies upon the policies of the General Plan to mitigate cultural resource impacts. These measures are not legally enforceable. The General Plan policies relied upon in the EIR should be adopted as legally enforceable mitigation measures.</p>	10-11
<p>DEIR Section 5.6 Geology- Soils</p> <p>The EIR relies upon the policies of the General Plan to mitigate geology, soils impacts. These measures are not legally enforceable. The General Plan policies relied upon in the EIR should be adopted as legally enforceable mitigation measures.</p>	10-12
<p>In addition, the following mitigation measure should be adopted.</p> <ul style="list-style-type: none"> The City shall require applicants to submit a site specific slope analysis 	10-13

identifying the following ranges: 0-25%, 25-50%, and greater than 50%	
<ul style="list-style-type: none"> • The City shall consider areas with slopes of 25% or over as unsuitable for types of development which require extensive grading or land disturbance. 	10-13
<p>DEIR Section 5.7 Hazards and Hazardous materials</p> <p>The EIR relies upon the policies of the General Plan to mitigate Hazards and Hazardous materials impacts. These measures are not legally enforceable. The General Plan policies relied upon in the EIR should be adopted as legally enforceable mitigation measures.</p>	10-14
<p>DEIR Section 5.8 Hydrology- Water Quality</p> <p>The EIR relies upon the policies of the General Plan to mitigate Hydrology- Water Quality impacts. These measures are not legally enforceable. The General Plan policies relied upon in the EIR should be adopted as legally enforceable mitigation measures.</p>	10-15
<p>DEIR Section 5.9 Land Use and Planning</p> <p>Section 5.9 of the DEIR focuses on direct land use impacts, which as it states includes interference with other land use plans. We note that Measures R and C are environmental policies and land use plans. Referring to the City's land use plans and policies, Measure R says "These plans and policies also destroy the City's remaining citrus groves, agricultural land, natural resources and historic Victoria Avenue. Our hills, ridgelines, arroyos and watersheds are being bulldozed. All these are priceless and irreplaceable civic amenities which enhance the quality of life and which we wish to preserve for ourselves and future generations." The voter passed measure then states specific provisions that affect the RA and RC zones. The measure further stated that "These provisions are minimum requirements for the promotion of the public health, safety and general welfare. This ordinance may be amended by a two-thirds affirmative vote of the City Council only to further its purposes." Measure C was passed by the voters in 1987 (and states that "Proposition R" means "Measure R"). Section 4 of Measure C, titled "Amendment to Proposition R to Correct City Abuse of Proposition R", incorporates Proposition R by reference, and provides that "This ordinance [thus including all provisions of Measures R and C] may be amended or repealed only by a vote of the people." We will provide lengthy details below on how certain provisions of the proposed Zoning Code violate Measure R.</p> <p>The DEIR, at p. 5.9-13 states</p> <p>"for the purposes of this EIR, a significant impact will occur if implementation of the General Plan will: ...Conflict with any applicable land use plan, policy or regulation of an agency with jurisdiction over the project adopted for the purpose of avoiding or mitigating an environmental effect; or Conflict with any applicable habitat conservation plan."</p> <p>Since (as we will show below) the Project conflicts with Measures R and C, which are applicable land use plans, policies and regulations of an agency (namely the City itself) with jurisdiction over the project, and since Measures R and C were adopted for the</p>	10-16

purpose of avoiding or mitigating an environmental effect, and to conserve habitat, and since these Zoning Code changes are at the programmatic level, this constitutes a significant environmental impact, which must be analyzed. This impact can be avoided by changing certain provisions of the proposed Zoning Code (“part of the project analyzed in this EIR” – p. 5.9-21) noted below. Before discussing this, we will continue going through other aspects of the DEIR in roughly the order presented there.

p. 5.9-14 (also at p. 5.15-41) Objective CCM-7: Minimize or eliminate cut-through traffic within Riverside’s residential neighborhoods.

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If the City is serious about this, it will eliminate the Overlook Parkway extension across the Alessandro Arroyo from the General Plan. See also further comments on this below.

p. 5.9-20 Objective OS-6: Preserve and maintain wildlife movement corridors. Springbrook Wash (connecting the Box Springs Mountains to the Santa Ana River, mentioned on p. 5.9-21) and the City’s other major arroyos should be added to the list given here.

The EIR relies upon the policies of the General Plan to mitigate Land Use impacts. These measures are not legally enforceable. **The General Plan policies relied upon in the EIR should be adopted as legally enforceable mitigation measures.**

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DEIR Section 5.10 Mineral Resources

The EIR relies upon the policies of the General Plan to mitigate Mineral Resource impacts. These measures are not legally enforceable. **The General Plan policies relied upon in the EIR should be adopted as legally enforceable mitigation measures.**

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DEIR Section 5.11 Noise

The EIR relies upon the policies of the General Plan to mitigate Noise impacts. These measures are not legally enforceable. **The General Plan policies relied upon in the EIR should be adopted as legally enforceable mitigation measures.**

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The following additional mitigation measures should be incorporated:

All commercial or industrial development projects of five acres or more and residential development projects of twenty units or more shall submit a construction noise reduction plan prior to the application being deemed to be complete. The Construction Noise Reduction Plan shall identify the methods to be used to ensure that city noise standards are not exceeded during construction along with calculations to support the conclusions.

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All commercial or industrial projects of five acres or more shall conduct an acoustical analysis to identify the impact of the project. This analysis shall be submitted prior to the application being deemed complete. The analysis shall identify the individual and cumulative impacts of the project. All individual and cumulative impacts shall be fully mitigated by the construction of sound walls

and/or the contribution of “fair share” fees adequate to compensate for all impacts to nearby properties.	10-20
Section 5.12 Population and Housing	
The EIR relies upon the policies of the General Plan to mitigate Population and housing impacts. These measures are not legally enforceable. The General Plan policies relied upon in the EIR should be adopted as legally enforceable mitigation measures.	10-21
This Section states “The Zoning Code and Subdivision Code essentially serve as implementing instruments of the General Plan; they will not directly or indirectly induce population growth.”	
As we shall see below, this statement is false. In particular, by relaxing the presently stringent conditions for benchmark and bonus densities for PRDs (in all residential zones), the changes allow and indeed give incentives for substantially greater densities, thus inducing substantial population growth in many areas, which (p. 5.12-3) is a significant impact. These are changes at the programmatic level that must be analyzed and mitigated.	10-22
p.5.12-4 “Objective LU-8: Emphasize smart growth principles through all steps of the land development process.”	
The DEIR at several places claims that the Project incorporates “smart growth” principles. But a basic principle of “smart growth” is to have more compact development in some places in order to have more open space (and other environmental amenities) outside the more compact development areas. However, this project is lacking in the creation of open space. The issue of creating more open space, in return for allowing higher densities, needs to be addressed. This must be part of the mitigation for the impact of creating (at the programmatic level) higher population densities.	10-23
Section 5.13 Public Services	
The EIR relies upon the policies of the General Plan to mitigate Public Service impacts. These measures are not legally enforceable. The General Plan policies relied upon in the EIR should be adopted as legally enforceable mitigation measures.	10-24
p. 5.13-10, 16: Of the two school districts in the City, for RUSD, “During the 2003-04 school year, 17 of the District’s 30 elementary schools, 4 of the 5 middle schools, and 5 of the 6 high schools operated with enrollments exceeding capacity Elementary enrollment exceeded capacity by 140 students, while middle school capacity was exceeded by 1,103, and high schools were overenrolled by 1,341 students. Overall, RUSD schools educated 2,584 more students than the facilities were designed to handle.” while for the Alvord district,	10-25

“With the exception of one school (Villegas Middle School), Alvord Unified School District school capacity currently exceeds enrollment for schools serving the Planning Area.6”

The DEIR (p. 5.13-17) states

“With the projected increase in population and new development, new or expanded education facilities will be required to adequately accommodate new students. This is a potentially significant impact. ... Table 5.13-3 indicates that the Project could generate approximately 27,000 new students through buildout who will attend either Riverside or Alvord Unified School District schools. When analyzed by education level, the Project will result in approximately 14,000 new elementary school students, 4,000 middle school students, and 8,000 high school students over the 20-year buildout period of the General Plan.”

It is obvious that the population growth envisaged by the Project will make the school overcrowding much worse, and that the minimal development fees allowed by State law will not be adequate. The DEIR claims that no measures to improve the situation can be imposed, because of the State Government Code Section 65995. However, State Government Code Section 65997 states

“(d) Notwithstanding any other provision of law, a public agency may deny or refuse to approve a legislative act involving, but not limited to, the planning, use, or development of real property, on the basis that school facilities are inadequate, except that a public agency may not require the payment or satisfaction of a fee, charge, dedication, or other financial requirement in excess of that levied or imposed pursuant to Section 65995 and, if applicable, any amounts specified in Sections 65995.5 or 65995.7.”

Thus the City needs to, and is permitted to, come up with some solution to the problem other than increasing developer fees, perhaps through the General Fund or by limiting residential development (as a largely bedroom community, the City already has more than its share of such development). The City manages to adequately fund its police and fire services. Surely it should and can do as much for its schools, and (considered next) its libraries.

The following mitigation measure should be adopted:

- For any residential project for which a General Plan amendment or Specific Plan is required, the project applicant shall submit an analysis of the impacts of the project on schools. The analysis shall include the existing capacity of schools serving the project and the fiscal impact of the project on the schools. This analysis shall be submitted prior to the application being deemed complete.

5.13-21

“The Riverside Public Library has indicated that City adopted standards for library service are not being met under existing conditions. ... Even following construction of planned new libraries for Orangecrest and Eastside and the planned expansion of the Arlington Library (additional 8,000 square feet), and the proposed expansion of the Main Library (additional 29,000 square feet), an

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adverse impact to public library services will remain. Future development pursuant to the Project policies and regulatory standards will increase demand for library services and thus exacerbate the current City library deficiency. ... there is no certainty that an acceptable service standard for library services can be achieved, particularly since the collection of the library parcel tax will cease in 2012 unless extended by voters. The Project does not include any other features that will help the City achieve its service standard for libraries. In order for the City to achieve library service that is deemed "acceptable" by the City's own measurement standards, the City will need to create additional library facilities above those already planned and ensure that facilities have sufficient volumes, hours of operation, staff and other features to ensure compliance with the City's standards – which are not being met under existing conditions. Impact is significant and mitigation is required. ...

Mitigation Measures

The continued collection of funds through the library parcel tax will work to minimize impact. However, absent any extension of the tax beyond 2012 by voter approval, which is not within the City's ability to control, or absent any other levied fee which would also require voter approval, the City cannot be assured of meeting its established service standards. Another option would be for the City to impose development impact fees that would include a proportion for library services and facilities. However, the potential for this measure to be adopted by the City Council cannot be known, nor is it clear that such a measure would generate funding sufficient to fully fund library service improvements triggered by new development. No other mitigation is considered feasible."

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The obvious solution to the Project impact on libraries is for the City Council to adopt the option of imposing appropriate development fees for libraries. The City Council can do that at the same time as it adopts the project. Compared to the roughly \$6,700 per house levied under the recently imposed TUMF fee for transportation, the amount needed for libraries would be tiny. When there is such a straightforward mitigation, there can be no approval of overriding considerations.

The following mitigation measure should be adopted:

- All residential developments shall pay a "library Impact Fee" of \$200.00 per residential unit at the time of issuance of building permits.

5.13-25

The proposed General Plan includes several objectives and policies related to community centers:

"Objective PF-10: Meet the varied recreational and service needs of Riverside's diverse population.

Policy PF-10.1: Provide every neighborhood with easy access to recreation and service programs by decentralizing community centers and programs. Promote the development of shared facilities and satellite offices in each Riverside neighborhood. ...

The City is committed to providing community centers and access to centers to meet needs of existing and future residents. Adherence to the policies listed above will reduce impact to below a level of significance. Individual development proposals will continue to comply with existing City standards and practices regarding review of adequacy of community center facilities. These standards and practices include: Implement CEQA during the development review process

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for future projects. Analyze and mitigate potential public facility, service and utility impacts to the maximum extent practicable. For projects that require construction of new public facilities or extension of utilities, ensure that the environmental documentation considers related off-site physical environmental impacts of these activities. Adhering to the project policies and City standards/practices listed above will reduce impacts related to community centers below a level of significance at the programmatic level. No further mitigation is required at the programmatic level."

There is a problem here. Many neighborhoods, including recently developed neighborhoods, do NOT have "easy access to recreation and service programs" and do NOT have community centers. This regrettable lack is the result of application of existing City standards and practices. And yet the DEIR proposes to mitigate the problem by applying "existing City standards and practices". This obviously will not mitigate the problem below the level of significance. At the programmatic level, there needs to be proper mitigation. A straightforward mitigation would be an appropriate increase in the developer fee for these improvements.

The following mitigation measure should be adopted:

- All residential developments shall pay a "Community Center Impact Fee" of \$300.00 per residential unit at the time of issuance of building permits.

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Section 5.14 Recreation

The EIR relies upon the policies of the General Plan to mitigate Recreation impacts. These measures are not legally enforceable. **The General Plan policies relied upon in the EIR should be adopted as legally enforceable mitigation measures.**

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p.5.14-3: The 40.2 acres stated for Islander Park is about double the actual size. Also, regarding acreage of developed parks, much the same remarks apply as above for community centers.

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Section 5.15 Transportation-traffic

The EIR relies upon the policies of the General Plan to mitigate traffic impacts. These measures are not legally enforceable. **The General Plan policies relied upon in the EIR should be adopted as legally enforceable mitigation measures.**

Section 5.15 shows serious and not entirely mitigable impacts on transportation, with some terrible peak-hour levels of service and concomitant air pollution. As noted on p. 5.15-23, this is based on SCAG's current projections for population increase that do not assume implementation of the Project. To the extent that the Project allows greater population growth than the present plan and ordinances (and we show below that it does allow and encourage such growth), it exacerbates an already serious problem. The EIR fails to analyze this. It also fails to consider some measures to improve traffic flow, such as over-or-under-passes at railroad grade crossings, and fails to consider an increase in developer fees (beyond the TUMF fee) to fund additional transportation improvements. Without such analysis and measures, a declaration of overriding concern is improper.

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We have mentioned several times that increased developer fees can be used to fund mitigation measures. We note that with the recent enormous increase in the average price

of new homes and the resultant enormous increase in profit by owners of developable land, the present developer fees (even with the new TUMF fee) are small in relation to new home prices and profits, and can stand being significantly raised to help mitigate some of the environmental impact caused by population growth.

p. 5.15-59

The DEIR provides some excellent goals for alternative modes of transportation:

“Objective CCM-10: Provide an extensive and regionally linked public bicycle, pedestrian and equestrian trails system.

Policy CCM-10.1: Ensure the provision of bicycle facilities consistent with the Bicycle Master Plan.

Policy CCM-10.2: Incorporate bicycle and pedestrian trails and bicycle racks in future development projects. ...”

and 10 more such Policies. However, the Project lacks actual implementation measures (at the programmatic level) for such Objective and Policies. This issue needs to be addressed.

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The following mitigation measure should be adopted:

- All development projects shall be responsible for fully mitigating their individual and cumulative impacts on circulation resources. All developments shall be responsible for contributing fees sufficient to fully offset their contribution to any exceedance of a Level of Service “D” for any roadway intersection or link. Fees shall be based upon the cost of all improvements necessary to achieve a level of Service “D” for all impacted intersections and links.

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Section 7 Alternatives

Only three alternatives are considered, and only briefly, namely 1. No project (meaning continuation of the existing General Plan and ordinances), 2. 25 percent reduction, and 3. Concentration of new growth along the L corridor. The choice and treatment of alternatives is set up to make the Project seem environmentally superior.

What is needed is consideration of an alternative which would allow mixed use (with concentration of new growth) in the L corridor but would compensate for the increased growth there by reduction of densities elsewhere (and public acquisition of relatively undevelopable land, such as steep hillsides and arroyos, with increased development fees paying for this and public service improvements), and would include updating of the zoning and subdivision codes (but consistent with the requirements of Measures R and C). We believe this alternative would be much superior environmentally, and needs to be considered to meet the requirements of the CEQA Guidelines.

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Some of the reasons given for rejecting some of the alternatives include such reasons as that they do not allow updating of the codes or provision for mixed-use development. But this is only an artifact of a too-narrow definition of the alternatives. For example, there is no reason why the existing General Plan and ordinances could not be amended appropriately.

Hawarden Hills Specific Plan and Victoria Avenue Specific Plan

The Project eliminates the existing Hawarden Hills Specific Plan and Victoria Avenue Specific Plan. Both of these Specific Plans were environmental plans and policies, adopted to preserve important environmental assets of the City. The DEIR fails to provide an analysis of which provisions of those Specific Plans are merely being transferred elsewhere into the Project texts, and which provisions are being deleted and the environmental impact of each such deletion. One such deletion is that of the trail provisions in the Hawarden Hills Specific Plan. Regarding this, an email from Planning Staff states

“Regarding the Tiburon Knoll issue in the new Hawarden Hills Neighborhood Plan As of this Draft document, Tiburon Knoll is not mentioned in the Neighborhood Plan. The City Council made a decision not to acquire the knoll, as was recommended in the Hawarden Hills Specific Plan (HHSP), under case GP-002-812 approved on December 8, 1981. Staff also notes that the proposed "trail" is not reflected on the Park and Recreation Master Trail Plan. For these reasons the knoll and trail issue were not carried forward to the new Neighborhood Plan.

Nevertheless, in regard to the trail in the last iteration of the Cherrywood map a condition was included for a trail dedication that would facilitate a trail from the Alessandro Arroyo to the knoll. We believe it is appropriate that the trail be added to the Parks, Open Space and Trails Map (PR-1) in the draft General Plan to support this recommendation. We will make this recommendation in the staff report to the Planning Commission. Thank you for bringing this to our attention.”

Mitigation needs to be provided for any decision not to acquire the knoll, and the knoll and trail issues need to be carried forward to the new Neighborhood Plan. In addition to adding the trail to the Trails Map, legally enforceable provisions need to be added to see that this trail, and all trails on the Trails Map, are actually acquired and constructed. And the question remains: what other environmental provisions of the said Specific Plans have been ignored?

New Zoning Code

The new Zoning Code (New Chapter 19 of Municipal Code), by Section 19.030.010, repeals and supersedes the provisions of the present Zoning Code. Therefore it is important to analyze the many changes with potential environmental impact, in particular, provisions that would allow higher residential densities than the present Code. We present the following comments for the environmental review of the proposed new Zoning and Subdivision Codes

New Section 19.040.050 (p. I-4) “Conflicts with Overlay Zones” states “In the event of any conflict between the requirements of the Zoning Code and standards in an adopted Overlay Zone or Planned Residential Development [“PRD”], the requirements of the Overlay Zone or applicable PRD shall govern.”(and similarly for Development Agreements, new Section 19.040.070, p.I-5) At present, when e.g. the lots in a PRD in

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the RC zone are smaller than allowed in the RC zone (without a PRD), the City considers granting variances. The new Section 19.040.050 appears to eliminate the need for such variances, and thus violates the provisions of Measure R and so is an illegal amendment to Measure R. While new Section 19.040.040 says that in case of conflict with “other regulations adopted by the City, the more restrictive provisions shall apply”, which might prevent such violations of Measure R, there are ambiguities here which need to be resolved. A specific question: for a PRD or Overlay Zone or Development Agreement for land to which Measures R and C apply (such as the RC zone), will variances for lot size, lot width, density, or building height (or other requirements of the underlying zone) still be required if the strict standards of the underlying zone are not met?

Is approval of a PRD a quasi-judicial act, as opposed to a legislative act? By allowing a less stringent (e.g., on the specific requirements for findings – see below) approval process for PRDs than for variances, the new code (in allowing PRDs and overlay zones to trump the standards of the underlying zone) weakens the standards for development. The effect of this on density (and concomitant effects on population, traffic, infrastructure etc.) needs to be analyzed.

Zoning Administrator Authority

Provisions in the new Zoning Code giving the Zoning Administrator discretionary authority over matters including interpretation of the Code and determination of zone boundaries (e.g. section 19.060.030 D and E) reduce transparency and public participation in planning matters, leading to environmental impacts (e.g. on density for RC zoned and other properties) which need to be analyzed. In particular, all issues to be considered and any decisions made by the Zoning Administrator need to be posted on the Web (as with Planning Commission and Council planning agenda items) in a timely fashion to allow public comment and appeal of decisions.

The authority granted to the Zoning Administrator regarding “any ambiguity in the regulations of the zoning code” under Article II of (Page 8) *Chapter 19.060 Interpretation of Code* is an attempt to modify Measure R and Proposition C without a vote of the people. This provision should be removed from the new Zoning Code. Any “ambiguities” that the City Council or Planning Department may feel exist in the Zoning Code should be modified by the City Council on a case-by-case basis, not through discretionary decisions made by one individual. Allowing the Zoning Administrator the authority to interpret the meaning of the code in cases of “ambiguity” amounts to a judicial action. Creating, modifying, and interpreting the legality or meaning of the Zoning Code is a right reserved for elected government officials and the Courts, not the Zoning Administrator.

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Average Natural Slope

The new Section 19.100.050 C (p. V-5) deals with the method of calculating Average Natural Slope (“ANS”). The notion of ANS plays a key role in Measure R, in determining what land is to be in the RC zone and the density and lot sizes for such land, as well as in the Grading Code. Any tinkering with or ambiguities in the definition of

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ANS would have a substantial environmental impact that would need to be analyzed. The technical definition given in 19.100.050 of the new Code, which definition appears to coincide with that in the present zoning code and in the Grading Ordinance (Title 17 of the Code), leaves open what is “natural”. The obvious meaning of “natural” (in referring to slope), and clearly the meaning intended in Measure R, is the slope in ungraded condition. However, recently we have seen a proposed tract map and a proposed grading plan for an individual lot, each in the RC zone, where there had been prior illegal grading and where the Staff report gave figures for Average Existing Slope instead of Average Natural Slope (for use in connection with minimum lot area and maximum pad size). If Average Existing Slope can be used instead of Average Natural Slope, developers will have a huge incentive to (illegally) grade land to reduce its slope, with devastating environmental consequences. The proposed (and existing) Code, after giving the formula for computing ANS, says “The average natural slope shall be computed from photogrammetric maps, grading permit plans and other data or evidence approved by the Public Works Department.” We maintain that this does not authorize the use AES, that is data for previously graded slopes, in place of ANS, but in view of current Planning Department practice, this needs to be spelled out to require the use of historical data (such as photogrammetric maps) from prior to any grading.

Further, language of the following sort on calculation of ANS also needs to be added to the ordinance:

When the slope calculations of a particular lot or parcel are disputed, the calculations shall be verified by a California Licensed Surveyor within the Public Works Department. Any discrepancies in the slope calculations shall be rectified by using the results of the Public Works Department survey.”

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This change is necessary to ensure that the provisions of Measure R and Proposition C are implemented and enforced. Currently, the City Public Works and Planning Departments have no authority to question or verify the results of independent engineering and land surveying firms. The use of independent engineering and land surveying firms is a conflict of interest given that grading and development contracts often rely on the survey results.

Density bonus for lower income housing

Regarding the provisions in the proposed Section 19.545 for density bonuses for provision of lower income housing: the DEIR needs to analyze the potential effect of such density bonuses on the increase in population and concomitant impacts, including on traffic etc.

Lot width

The proposed Zoning Code, by changing the definition of building setback line, in effect amends the previous minimum lot width requirement, in particular in the RC zone, to allow flag lots (or “corridor access lots”), thus constituting an illegal amendment of provisions of Measure R, as well as having an unmitigated and unnecessary negative environmental impact through allowing and encouraging additional hillside density, with

the potential for concomitant increased grading, erosion, and other environmental impacts. Here is the pertinent provision of the proposed Zoning Code:

19.630.030 Building Setback Measurements

B. Front Yard Setbacks

The front setback line is a line parallel to the front property line abutting the street, at a minimum distance specified by the base zone measured at right angles from the front property line, except as follows:

1....

2. Flag lots

Regardless of the orientation of the main building, the measurement shall be taken from a parallel line established where the access strip meets the buildable area of the parcel closest to the public street or right-of-way.

The present code says

Section 19.04.070 Building line.

"Building line" means a line parallel with the front lot line or planned street line and distance therefrom the depth of the required front yard.

and provides no exception (except by variances). Thus the proposed new Code would newly allow flag lots and other lots whose lot width would not be sufficient under the present code but where the "buildable area" would be sufficiently wide. The notion of "buildable area" is sufficiently flexible to allow many lots which would not meet the previous minimum lot-width requirement. The potential increase in density and other impacts of this change in all zones needs to be examined. Moreover, by now allowing in the RC zone flag and other lots not meeting the previous lot-width requirement, the proposed new code would be an amendment of the provisions of Measure R and thus illegal by Measure C.

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A good example of the effect of the proposed change is Tract Map 29628 (the 2002 approval of which was rescinded in 2004 as the result of an FRH lawsuit, but which we understand the developer plans to resubmit in much the same form). That case involved a number of lot width variances in the RC zone, for flag lots and for lots fronting on curves and cul-de-sacs. The staff report for that case makes it clear that because of the terrain and previously approved street design, it would not have been feasible to design the map to legally allow nearly as many as the 35 lots which were approved unless variances were granted; such variances would be unnecessary if the proposed new Code were to take effect. This effect of increasing density would potentially occur in numerous tracts (developers would predictably exploit the weakening of the lot width standards) throughout the city, and not just in the RC zone. The DEIR gives no analysis of the potential impact of this increased density. Any claim that Projects facilitated by these changes will be reviewed pursuant to CEQA on a case by case basis is unacceptable as improper deferral of environmental studies. Since, in general, weakening minimum lot dimension requirements allows more lots, there needs to be an analysis, not provided in the DEIR, of the legality of the proposed change in relation to Measure R, as well as its effects in allowing more lots, whether flag lots or lots with reduced frontage around cul-de-sacs, than would otherwise be allowed unless granted variances

Here are more specifics on the relation of lot width requirements to Measures R and C. The voter-approved Measure R was adopted in November, 1979. The portion of Measure R specifically pertaining to zoning requirements for hillside land is in Section 4 of Measure R, which states, in pertinent part, “The Residential Conservation (RC) Zone as described in the Riverside Municipal Code on May 15, 1979 is hereby applied to all property having an average natural slope of 15 percent or more, except that all lots having an average natural slope of 15 to 30 percent shall be limited to one single family dwelling per two acres. Lots having an average natural slope of greater than 30 percent shall be limited to one single family dwelling per five acres.” [emphasis added] (There are also exceptions in Measure R for land which had previously been zoned RC, for construction of one owner-occupied dwelling on a then pre-existing lot of less than the minimum lot size, and for subdivisions which had then already been issued building permits.)

As we shall note below, the Code for the RC Zone on May 15, 1979 included provisions for both minimum lot width and for minimum lot size, and the language in the portion of Measure R quoted above just strengthens the then existing provision of the RC zone with regard to minimum lot size. However the fact that Measure R did not strengthen (or indeed change in any way) the then existing provision of the RC zone for minimum lot width merely means that that provision was to apply without change, as a provision specified by Measure R. By the language of Measure R, which by an Appellate Court decision means what it says, that provision, “as described” then in the Code, was “hereby applied” to all property with slope of 15% or more, and could not earlier and cannot now be changed except by the manner of amendment specified in Measures R and C.

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The present Code provisions regarding minimum lot width and minimum lot size are both in Code Section 19.09.050. The legislative history of the provisions given there shows that the said Code section is as enacted in Ordinance 5585 Section 20, adopted in 1987, and that the previous versions were in Ordinance 4564 Sections 1 and 2, 1978; and Ordinance 4399, Section 1 (part), 1977. So we need to go back to Ordinances 4399 and 4564 to see what were the provisions as described in the Code on May 15, 1979.

Ordinance 4399, adopted April 12, 1979, is titled “AN ORDINANCE OF THE CITY OF RIVERSIDE, CALIFORNIA, AMENDING CHAPTER 19.09 OF THE MUNICIPAL CODE IN ITS ENTIRETY AND SECTION 19.06.010 BY ESTABLISHING A RESIDENTIAL CONSERVATION (RC) ZONE.” Its provision for lot width is included in the following: “19.09.050 LOT AREA. The lot area requirements shall be as follows: Every lot shall have a minimum width at the building line of one hundred thirty feet and a minimum area of one-half acre, ...” [emphasis added]

Ordinance 4564 was adopted July 5, 1978. It is concerned only with the Hawarden Drive special design area. Its only mention of lot width is: “where a lot or parcel located within the Hawarden Drive special design area has less width or less area than herein required and was a legally created lot of record prior to June 16, 1977, such lot may be occupied by a single-family residential use if the lot has a minimum area of one-half acre.”

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Thus the provision with regard to lot width which was “hereby applied” by Measure R to all steep lots zoned RC and created after May 15, 1979 is that stated above for Ordinance 4399, namely that the “lot shall have a minimum width at the building line” of 130 feet. [emphasis added]

Measure R, Section 7, states “These provisions are minimum requirements for the promotion of the public health safety and general welfare. This Ordinance may be amended by a two-thirds affirmative vote of the City Council only to further its purposes. This ordinance may be amended or repealed by a vote of the people.” Measure C, passed by the voters on Nov. 3, 1987 and formally adopted by the City one week later, in its Section 4 states that, regarding Proposition R (which is the above Measure R by Definition 3b. of Measure C): “Proposition R is attached hereto and incorporated herein by this reference. Section 7 of Proposition R is hereby amended to read as follows: Section 7. These provisions are minimum requirements for the protection of the public health, safety, and general welfare. This Ordinance may be amended or repealed only by a vote of the people.” [emphasis added]

The legislative record quoted above shows that the provisions of Measure R concerning minimum lot width or area were amended just once, in Section 20 of Ordinance 5585. Said Ordinance 5585 was adopted November 3, 1987, with the explicit statement in its Section 29 that “The City Council hereby declares that this ordinance furthers the purposes of Measure R, enacted November 13, 1979. A two-thirds affirmative vote of the City Council is required for adoption of this ordinance.” This language used in Section 29, copying the language of Section 7 of Measure R, shows that this is an amendment of the provisions of Measure R and therefore constitutes an amendment of Measure R.

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The parts of said Section 20 of Ordinance 5585 which state anything about lot width are included in the following: “19.09.050 LOT AREA.

A. The lot area requirements for land zoned RC prior to May 15, 1979 shall be as follows: (1) Every lot shall have a minimum width at the building line of one hundred thirty feet and a minimum area of one-half acre ... (2) Notwithstanding the provisions of paragraph (1) of this subsection, every lot or parcel located within the Hawarden Drive Special Design Area shall have a minimum width at the building line of one hundred thirty feet and a minimum area of two acres; provided, however that where a lot or parcel located within said area has less width or less area than herein required and was a legally created lot of record prior to June 16, 1977, such lot may be occupied by a single-family residential use if the lot has a minimum area of one-half acre.

B. The lot area requirements for land zoned RC on or after May 15, 1979 shall be as follows: (1) Every lot with an average natural slope of less than 15% shall have a minimum width at the building line of one hundred thirty feet and a minimum area of one-half acre; every lot with an average natural slope from 15% to 30% shall have a minimum width at the building line of one hundred thirty feet and a minimum area of two acres; every lot with an average natural slope over 30% shall have a minimum width at the building line of two hundred feet and a minimum area of five acres; ...” [emphases added]

Thus we have the following three categories for lots on land in the RC zone, the first two of which with the provision that the minimum lot width at the building line shall be 130 feet.

1. For lots on land zoned RC on or after May 15, 1979 and having average natural slope of 15% or more, the provision holds by the terms of Measure R itself, with its reference to the RC zone as described in the Code on May 15, 1979. By Section 7 of Measure R as amended by Section 4 of Measure C, this lot width provision cannot be amended except by a vote of the people.
2. For lots which are either on land zoned RC prior to May 15, 1979 (but are not one of the Hawarden Drive lots in category 3 below) or on land having average natural slope less than 15% and zoned RC on or after May 15, 1979, the provision holds by the 1987 amendment in Ord. 5585, with the explicit declaration in that amendment "that this ordinance furthers the purposes of Measure R". By Section 7 of Measure R as amended in Section 4 of Measure C, the lot width provision cannot be further amended except by a vote of the people.
3. For certain lots in the Hawarden Drive Special Design Area which were of record prior to June 16, 1977, there is no restriction on the lot width if the lot has a minimum area of one-half acre; this is by Measure R since the latter incorporates the provisions of Ordinance 4564.

Note that in present Code section 19.09.050 (and in the ordinances preceding it, including that establishing the RC zone), minimum lot width (always at the building line) is always prescribed together with any provision for minimum lot size, and is indeed always mentioned first. This implies that the provisions for lot width are just as important as those for lot size, and are to be applied just as strictly, and in the same context, as those for lot size.

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The term "one hundred thirty feet" (or "two hundred feet") is clear enough. We now analyze the rest of the phrase, "at the building line", which is conjoined with it, and of which the proposed new Code would change the meaning, as noted above. By present Code Section 19.04.070,

"building line" means a line parallel with the front lot line or planned street line and distance therefrom the depth of the required front yard."

So we need to examine the term "required front yard" as it relates to the RC zone. Code Chapter 19.09 is entitled "Residential Conservation (RC) Zone". Section 19.09.060 thereof is entitled "Yards"; the legislative history for this Section is: Ordinance 5585 Section 21, 1987; and Ordinance 4399 Section 1 (part), 1977. Said Section 19.09.060 states in pertinent part:

"there shall be established and maintained the following minimum yards:

A. A front yard having a depth of not less than thirty feet; ...

D. Notwithstanding subsection A of this section, no lot which fronts onto Hawarden Drive within the Hawarden Drive special design area shall have a front yard depth of less than fifty feet."

Here part A. is exactly as in Ordinance 4399 (the ordinance which established the RC zone) and repeated in Ordinance 5585, and D. is essentially exactly as in Ordinance 4399 and repeated in Ordinance 5585 Section 21.

What this means is that Measure R, when it stated “The Residential Conservation (RC) Zone as described in the Riverside Municipal Code on May 15, 1979 is hereby applied” to certain steep land, included the provision that the minimum lot width is to be 130 feet at a line 30 feet (or 50 feet in the case of certain Hawarden Drive lots) from the front lot line or planned street line, since this provision is part of Ordinance 4399 which was in force on May 15, 1979. Moreover this provision was extended to the rest of the RC zone by Ordinance 5585. Hence this provision, by Measures R and C, cannot be amended except by a vote of the people.

The net result of the above facts is that the City cannot, without a vote of the people, amend the present provisions of the Zoning Code for the RC zone with regard to minimum lot width and where it is to be achieved or measured. Any attempt to tinker with these provisions, as in the proposed change in the definition of “building line” with regard to where it is measured, is illegal as contrary to Measures R and C, unless done by a vote of the people.

Such tinkering with lot width requirements in most zones other than RC might be legal, but much of it is unwise. In particular, allowing flag or panhandle or corridor access lots is simply bad planning. As a 2003 Planning Staff report says, “It is still noted that flag lots are not an effective or desirable design in many cases”. The fact noted in that Staff report that some cities in the area do allow such lots and others do not is hardly to be taken as encouragement for Riverside to allow them. We think Riverside should be in a leadership position among cities as a beautiful city, with high standards for planning and not the lowest common denominator of standards. In any case, the proposed change needs an analysis of its environmental impact, in particular with regard to its effect in allowing higher density than could otherwise be achieved. One of the advantages of having a fixed minimum lot width at the building setback line (as measured from the front lot line) in the RC zone is that it helps to deter developers and their engineers from playing games with the map to try to exploit a variable lot width to squeeze in more lots and achieve a higher density than is appropriate for the terrain.

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Floor Area

The present code contains the following requirement for multiple family housing (R3 and R3(H), the latter now to be designated R4):

Section 19.16.060 Floor area per dwelling unit.

The minimum floor area per dwelling unit in any multiple-family residential zone shall be as follows:

- A. Four hundred square feet for each efficiency unit;
- B. Five hundred square feet for each unit having one bedroom;
- C. Six hundred fifty square feet for each unit having two bedrooms;
- D. Seven hundred fifty square feet for each unit having three bedrooms;
- E. An additional one hundred square feet shall be required for each bedroom exceeding three.

By contrast the proposed new code 19.100.070 (p. V-9) has the following provisions:

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A. Floor Area per Dwelling Unit

The minimum floor area per dwelling unit in the R-3 and R-4 zones shall be as follows:

1. 350 square feet for each unit; and
2. An additional 150 square feet shall be required for each bedroom in excess of two bedrooms.

The proposed new minimums thus constitute a sharp reduction in the current minimums, potentially changing the character of apartment life in the City. The potential impact of the change needs to be analyzed in the EIR.

Reduction of required open space for multiple-family housing

The proposed new section 19.100.070 (p. V-9 to 11) sharply reduces the amount of common usable open space required in multiple-family zones, as compared to that presently required (cf. Section 19.16.080 "Usable open space" of the present code). The impact of this reduction needs to be analyzed in the EIR.

The present code Section 19.16.070 "Distance between buildings" contains requirements on the minimum distance between buildings in multiple-family housing. We did not find such restrictions in the proposed new code. There may be other requirements in the present code, not cited here, which are weakened or eliminated in the proposed new code. The EIR needs to make a thorough comparison of the current and proposed new Codes and analyze the impact of each such weakening or elimination.

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Variance findings

At present, by Zoning Code Section 19.64.130 (which remains valid although the pertinent part was mistakenly deleted in 2003 by a clerical error; staff has informed us by email that they are currently working with the City Clerk to get it added back to the text of the existing Code) for each variance to be granted by the City, every one of the four following findings must be made

- "1. That the strict application of the provisions of this title would result in practical difficulties or unnecessary hardships inconsistent with the general purpose and intent of this title;
2. That there are exceptional circumstances or conditions applicable to the property involved or to the intended use or development of the property that do not apply generally to other property in the same zone or neighborhood;
3. The granting of such variance will not be materially detrimental to the public welfare or injurious to the property or improvements in the zone or neighborhood in which the property is located;
4. That the granting of such variance will not be contrary to the objectives of any part of the General Plan adopted by the Planning Commission or City Council."

In the new version, Section 19.720.040 (p. IX-30), the word "either" needs to be eliminated or the text edited for the word to make sense. The four required findings in the text of Section 19.720.040 have essentially the same wording as those of Section

19.64.130 listed above, with the following exception: the new version of finding number 2 changes the former wording “in the same zone or neighborhood” to “in the vicinity and under the identical zoning classification.” The crucial change here is from “or” to “and”. This is especially pertinent to the RC zone, which is applied specifically to the City’s steep hillside properties. The problem is that some of the hills are isolated, and there are no other RC zoned properties in the vicinity of some of these parcels. For such cases, under the previous but not the present version, a comparison would need to be made to other RC zoned properties. This easing of the variance findings requirements for RC zoned property constitutes an amendment to Measure R, and is thus illegal. Also, the environmental impact of any such change needs to be analyzed and mitigated.

Second units and Auxilliary units

Section 19.480.030 (p. VII-95) of the proposed zoning code allows second dwelling units on any lot meeting certain size requirements, which in zones requiring a minimum lot area of at least 10,000 sq. ft. would be any conforming lot. Moreover there would be no maximum size for the second unit. Since these provisions would apply to built-out neighborhoods as well as to vacant land, this would have the potential to enormously increase density throughout much of the City. **This needs to be analyzed in the EIR, and mitigation provided.**

Moreover, Subsection D of proposed Section 19.480.030 says

“D. The number of total dwellings permitted on a single lot in any single-family residential zone, except the RC and RA-5 Zones, shall be limited to no more than two, ...”

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Measure R does not permit a second dwelling in the RC and RA zones. The intent here may have been to not allow a second dwelling in the RC and RA-5 zone lots, but the wording would allow a second or even third dwelling. The wording needs to be corrected to be in accord with the requirements of Measure R.

Chapter 19.425 (p. VII-81) of the proposed Zoning Code says that Auxiliary Dwelling Units (Granny Housing) are permitted as set forth in Article V, Base Zones, subject to the requirements in this Chapter 19.425. Since Measure R limits lots in the RC zone to a single-family dwelling, and it is not clear that the wording in said Article V prohibits Auxiliary Dwelling Units, it needs to be made clear that this Chapter 19.425 does not apply to lots in the RC and RA-5 zones. Otherwise the provisions of the Chapter would be illegal amendments of Measure R.

PRDs and Density

The present PRD ordinance, Section 19.65, in Section 19.65.050 Density, includes the following provisions:

The following regulations shall determine the maximum number of dwelling units per acre allowable in a planned residential development:

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A. The Planning Commission shall determine the maximum number of dwelling units per acre allowable in a planned residential development based on benchmark densities established for the underlying zone in which the project is located. The following benchmark densities are based on the planned residential development being located in reasonably close proximity to schools, shopping areas and public and semipublic facilities, the site having good access and advantageous slope conditions, the project being well designed and exhibiting desirable amenities and other appropriate criteria with which a planned residential development is evaluated.

Zone Density per Acre RC 0.5 HR 1.2 RR 3.0 R-1-130 3.0 R-1-125 4.8
R-1-100 5.5 R-1-80 6.3 R-1-65 7.3 R-3-40 10.8 R-3-30 14.5 R-3-R 17.5
R-3-20 21.5 R-3 29.0

(The site area used as the basis for determining the number of dwelling units per acre shall not include abutting public streets or alleys, but may include property to be dedicated for new public streets within the development or for the widening of existing public streets which abut the property.);

B. The Planning Commission may determine that in the RC zone up to a twenty-five percent increase in dwelling unit density and in the remaining zones up to a ten percent increase in dwelling unit density beyond the established benchmark density may be permitted if the following conditions are applicable to the project:

1. The property is well located in close proximity to schools, shopping, and public and semipublic facilities. Proximity to schools is not to be considered when projects are designed to be occupied only by adults;
2. The property enjoys excellent access from the adjoining public street or streets;
3. The project is designed or otherwise intended for occupancy by adults demonstrated by a low bedroom- to-unit ratio for the project;
4. The design of the project exhibits superior utilization of the site as evidenced by the following:
 - a. Varied placement of buildings demonstrating sensitivity to the natural topographic features of the site,
 - b. Retention of unique natural features of the site and incorporation of such features into the project's overall design,
 - c. Except in the RC zone relatively level land set aside for active recreation pursuits,
 - d. Majority of dwelling units afforded direct access to common usable open areas well designed for their intended purposes,
 - e. An efficient internal circulation system consisting of private streets and driveways that follow natural courses in the case of hilly land;
4. The project reflects sensitivity to the impact of buildings on surrounding properties;
5. The project contains varied building elevations exhibiting excellence of design that complement each other and the surrounding area;

The present ordinance also contains provisions for up to a 50% reduction from the benchmark density under certain conditions, namely:

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C. A unit density less than the benchmark density established for the underlying zone may be established by the Planning Commission if one or more of the following negative factors are applicable to the project:

1. The property is inadequately located in terms of easy access to schools, shopping or public and semipublic facilities;
2. The property has inadequate access from the adjoining public street or streets;
3. The property is characterized by steep slope necessitating extensive grading for project development. In cases where slopes average between five and ten percent, the Planning Commission may reduce unit density by up to twenty-five percent of the benchmark density, and in cases where slopes exceed ten percent, the Commission may reduce unit density by up to fifty percent of the benchmark density to minimize and discourage unnecessary and undesirable grading;
4. The project fails to adequately incorporate the following desirable design features:
 - a. Unique natural features of the site are not retained or are inadequately incorporated into the project's overall design,
 - b. Common usable open spaces are inadequately located in terms of accessibility of units served and are inadequately designed for their intended purposes,
 - c. An inefficient or poorly designed internal circulation system;
5. Certain facilities (freeways, railroads, airports and the like) are situated adjacent or in close proximity to the property creating a detrimental environmental impact for residential uses thereon;
6. The project unduly inhibits or interferes with the development of surrounding properties. (Ord. 5585 §§ 26, 27, 28, 1987; Ord. 5274 § 4, 1985; Ord. 4260 § 2, 1976; Ord. 4208 § 4, 1975; Ord. 3972 § 2 (part), 1972)

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The ordinance (5585) allowing up to a 25% density bonus in the RC zone was adopted by the City Council on Nov. 3, 1987, the same day as the voters passed Measure C (which was certified by the Council one week later, on Nov. 10, 1987). As noted above (under the Lot-width section), this provision constituted an amendment to Measure R, allegedly to further that Measure's purposes. As an amendment to Measure R, the PRD provisions, including the density bonus in the RC zone, may be invalid as violating the provision of Measure C barring such amendments except by a vote of the people, since the ordinance was passed by the City Council on the same day, November 3, 1987, as the voters passed Measure C. Measure C was certified by the City on November 10, 1987; one of its provisions was its "effective date" was the date of its passage. That preceded the effective date of Ordinance 5585. However, assuming that Ordinance 5585 was passed in time to for its RC-zone provisions to be valid, we say by its provisions (quoted above) that there are rather stringent conditions to meet the benchmark density (in any zone), and even stricter conditions to qualify for a density bonus. These conditions need to be strictly stated and interpreted in view of the tendency of the City to indulge developers' requests. Any weakening of the present conditions for PRD density will lead to higher densities, with associated environmental impacts that need to be analyzed. This applies to all zones. In addition, any weakening of the PRD density conditions in the RC zone would constitute an amendment to Measure R (just as Ordinance 5585 constituted such an amendment), and so by Measure C would be illegal without a vote of the people. We now

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consider the provisions for PRD density in the proposed new code, and will note that in significant ways they constitute a weakening of current provisions.

The draft PRD density provisions (Section 19.780.050 Density, pp. IX 49-51) state, in pertinent part,

A. Benchmark Density

The Planning Commission shall determine the base number of dwelling units allowable in a [PRD] based on benchmark densities for the underlying zone ... shown in Table 19.780.040 [which appears to show the same benchmark densities as in the corresponding present zones]. The minimum standards for a project to qualify for a PRD with the benchmark density are that it be adequately served by public infrastructure, including good access to public and private services, and that the site is well designed with desirable amenities in accordance with adopted Citywide Design Guidelines and in accordance with City Codes (Note: Compliance with City Codes allows for granting of variances in certain instances.) in order for a project to qualify as a PRD it must meet these minimum benchmark density requirements. In the case of PRD's in the RC Zone, the following additional criteria apply to qualifying for the benchmark density

1. Retention of unique natural features, including arroyos, hillsides and rock outcroppings, in natural open space areas or otherwise as part of the project.
2. Placement of buildings demonstrating sensitivity to the natural topographic and habitat features of the site, including clustering of homes in order to preserve such natural features and valuable natural open space, both for wildlife habitat and visual aesthetic purposes.

D. Density Bonus for Superior Design

A PRD project may qualify for a density bonus as shown in Table 19 [which appears to be the same percentage density bonus as in the present Code for corresponding zones] based on the following criteria beyond those in 19.780.040A.

1. The project shows superior design in the site layout and provision of common, active recreational and cultural amenities, including, but not limited to swimming pools, club houses, tennis courts, multipurpose trails and art pieces visible to the public, including sculptures and water features such as fountains. The site layout shall also exhibit features found to promote pedestrian activities both within and to areas outside of the site.
2. Superior Design of individual dwelling site plans and building architecture, including such features as porches and garages set back from the street in comparison to the house, and detailed four sided, building treatments. Many of the desirable features are found in the adopted Citywide Design Guidelines.
3. Sensitivity to impacts of the development on surrounding uses.

Note that the benchmark requirement of "reasonably close proximity to schools, shopping areas ..." is being replaced by the less stringent requirement of "good access to public and private services". Note also that a number of present requirements for a density bonus are eliminated, including the following:

"close proximity, as opposed to the benchmark requirement of merely
"reasonably close proximity", to schools and shopping;

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“excellent access” from adjoining streets as opposed to the benchmark “good access”;
 a low bedroom-to-unit ratio;
 majority of units having direct access to common usable open areas.

These eliminations represent a weakening of the present PRD ordinance to allow greater density. Of still greater significance is the change in the language directing the City’s actions in approving a PRD density bonus. The present ordinance says that such a bonus

“may be permitted if the following conditions are applicable to the project” and then lists the conditions. The common English meaning of “if the following conditions are applicable” is that all of the conditions must be satisfied, not just one or two or three (there is no contradiction between the condition on proximity to schools and that on adult occupancy, since a careful reading shows that the latter condition, phrased in terms of a low bedroom-to-unit ratio, merely means that the project is mainly but not exclusively for adult occupancy). But the proposed new code changes the language to

“may qualify for a density bonus ... based on the following criteria ...” which is much more vague and would seem to allow a maximum density bonus merely for meeting just one of the conditions, perhaps merely for following the standard design guidelines. There should be no density bonuses permitted merely for conforming to the city codes and design guidelines. Our experience shows that developers will generally ask and lobby for the maximum density bonus, regarding it as an entitlement. The weakening of the language on conditions for a density bonus will lead to greater density. The extent of such greater density, and its environmental impact, need to be analyzed in the EIR. Further, for the RC zone, such weakening of the requirements for a density bonus (a serious matter since this is the only zone where a large 25% bonus can be given) constitutes an amendment to Measure R, and thus is illegal.

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Subsection C of the proposed new Section 19.780.050 (p. IX-50) allows density transfers between zones within a PRD. This appears to conflict with Measure R, and thus may be illegal. The issue needs to be analyzed in the EIR.

Transfer of Density

Proposed new Code Section 19.780.050 introduces the following provision (it appears that no such provision is in the present code):

“C. Transfer of Density

When two or more General Plan land use designations or base zones exist within a planned residential development, the density may be transferred between designation and/or zones within the same development as necessary to provide for a superior development based upon good planning principles and to promote the general welfare of the neighborhood and maximum benefit to the natural environment. ... In the case of such a density transfer, the overall maximum density shall not exceed that otherwise permitted by the General Plan designation(s)... For purposes of this Section, a project may consist of more than one underlying legal parent parcel ... contiguous unless separated by an existing public or private street.”

We note first that the criteria used – “superior development”, “good planning principles”, “promote general welfare”, “maximum benefit” – are lacking specificity and allow a virtually limitless range of interpretation. Also, the provision appear to allow a density transfer to an RC-zoned parcel from another zone, as well as the other way. Most important, hidden within the language is the following situation: a steep hilly parcel in the RC zone (with GP designation RHS) with average natural slope greater than 30% requiring minimum lot sizes of at least 5 acres could have its density transferred to a flatter parcel a considerable distance away (although “contiguous” by a chain of intervening parcels). Say the steep hilly parcel has area 50 acres, and thus by the 5-acre minimum would qualify for a maximum of 10 lots (actually less if not in a PRD, because of the area needed for roads). But since the General Plan designation (contrary we believe to Measure R) for the steep land has a maximum density of 0.5 per acre, i.e., 2-acre minimum lots, the parcel would qualify for a density transfer of 25 units, a 150% bonus. (This is not purely a hypothetical situation; it appears that a developer and the City want to do something like such a density transfer in a specific case.) Such a provision is clearly an amendment of explicit provisions of Measure R, and thus illegal.

The provisions should be amended to clarify that density transfers into an RC zone are not permitted and that density transfers into areas with natural slopes in excess of 15% are not permitted.

PRD development standards

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The present code Section 19.65.060 requires that PRDs provide 500 sq. ft. of common usable open space per bedroom for each dwelling unit having three or more bedrooms, but allow a credit of up to 40% for private open space above the minimum requirement. This means that for each 5- (respectively, 4-, 3-)bedroom unit there must be at least 1,500 (respectively, 1,200, 900) sq. ft. of common usable open space. But the proposed new Code only requires a minimum of 500 sq. ft. of common open space per dwelling. Assuming all of that is “usable”, that is a reduction of 67% (respectively, 58%, 44%) in the required open space for each 5- (respectively, 4-, 3-)bedroom unit. Thus for a PRD with an average of say 3.6 bedrooms per unit (like some recent PRDs in Riverside), this would be a reduction of at least 54% in the required usable open space. This huge reduction in the requirement for common usable open space needs to have its impact (e.g. on density and on recreation) analyzed in the EIR. For the RC zone, this reduction constitutes an amendment of Measure R (as previously amended) and thus is illegal. The proposed new Code also comments on natural open space in the RC zone, but of course that is not within the meaning of “usable” open space.

The present code Section 19.65.070 requires 250 square feet of private open space per unit, but the proposed new code (p. IX-53) only requires 200 sq. ft.

The present code says that the maximum building coverage in a lot in a PRD cannot exceed the standard of the underlying zone, but the proposed new code (p. IX-51) leaves the matter to the discretion of the Planning Commission.

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Some other provisions for PRDs of the present Code, including Section 19.65.120 for minimum distance between buildings, and Section 19.65.160 for storage area, are simply eliminated in the new Code.

Proposed new Subsection C1 of 19.780.060 (p. IX-53) says:

“Lot Size [for RC Zone PRDs]

½ acre minimum lot size (net), independent of lot slope.”

Since some of the residential lots in a proposed RC Zone PRD might have average natural slope greater than 15%, this proposed provision is a clearly would amend Measure R, and thus is illegal.

Proposed new Subsection C5 of 19.780.060 (p. IX-53) says

5. Common Natural Open Space and Clustering

“... There is no minimum standard [for common open space in an RC Zone PRD] although each development is encouraged to set aside a substantial portion of the site toward natural open space.”

Under the present ordinance and Measure R, clustering of a project in the RC zone would require variances, with the appropriate careful consideration. The proposed provisions allowing clustering without variances amend Measure R and thus are illegal. The mere “encouragement” of setting aside natural open space, without any specifics on what constitutes a “substantial portion”, are subject to low expectations and abuse.

Two general provisions for PRDs in the proposed Code deserve special attention. First, 19.780.060 A. Relationship to Base Zone Development Standards (p. IX-51) says

“The development standards set forth in this Section, if in conflict with the development standards of the underlying base zone, shall supercede the development standards of the underlying base zone. ...”

And second, 19.780.060 E. Modification of Development says

“The Approving Authority may modify the development standards set forth in this Chapter for an individual PRD upon the finding that such modification better achieves the intent and purpose of this Chapter than strict application of the PRD standards.”

The first of these changes eliminates the present use of variances e.g. in the RC zone when a the lot size of a lot in a PRD conflicts with the minimum required by the RC zone and Measure R. This appears to be an illegal amendment of Measure R. The second change is more drastic. It essentially makes meaningless (as so easily overridden) any of the specific requirements for development standards for PRDs. In view of the observed tendency of the Approving Authority (Zoning Administrator, Planning Commission or City Council) to fall in line with whatever certain developers want, and the political influence wielded by developers, to leave the application of development standards for a particular tract to what is essentially a political process is a remarkable change from the previous requirement of proper variance findings. The environmental impact of these changes needs to be analyzed in an EIR. And for the RC zone, these changes certainly constitute an illegal amendment of Measure R.

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OTHER COMMENTS
SUBDIVISION CODE – TITLE 18

The authority granted to the Zoning Administrator regarding “any ambiguity in the regulations of the zoning code” under Article II of the (Article II, Page 8) *Chapter 18.060 Interpretation of Code* is an attempt to modify Measure R and Proposition C without a vote of the people. This provision should be removed. Any “ambiguities” that the City Council or Planning Department may feel exist in the Subdivision Code should be modified by the City Council on a case-by-case basis, not through discretionary decisions made by one individual. Allowint the Zoning Administrator the authority to interpret the meaning of the Code in cases of “ambuiguity” amounts to a legislative or judicial action, reserved for the City Council and the Courts.

General Plan: More on Overlook Parkway

The General Plan (GP) makes several references to the extension of Overlook Parkway across the Alessandro Arroyo (e.g., *Land Use and Urban Design Element, Circulation and Community Mobility Element*). Within the Land Use and Urban Design Element the GP proposes the minimization of public development in and in close proximity to any of the city’s arroyos.

Extending Overlook Parkway is contradictory to nearly every other element of the GP. The extension of Overlook Parkway will have significant environmental impacts on the city’s arroyos, hillsides, wildlife (including endangered and threatened species) and an important wildlife corridor, and Victoria Avenue.

Amazingly, the Environmental Impact Report (EIR) prepared for the GP states that “No mitigation is required, as is less than significant at the programmatic level”. Simply stating that adhering to the elements of this updated GP will reduce the level of impacts below a level of significance at the programmatic level is not adequate to address the cumulative environmental impacts that the extension of this roadway will have on these important elements of our city.

The EIR ignores the real impacts associated with extending this road. Development in and around the Alessandro Arroyo has already devoured vital habit for our most vulnerable species including the California Gnat Catcher and Burrowing Owl.

Piecemeal development near the Alessandro Arroyo and Overlook Parkway over thelast decade has pushed development into Water Course and Open Space zones and through Blue Line Streams. Preserving small sections of scattered open space in and around these developments has destroyed most of the connectivity of the arroyo to other wildlife areas (e.g., Sycamore Canyon, Prenda Arroyo, etc.).

The EIR also ignores the majority of the comments submitted by Riverside’s citizens who came to California Baptist University in September 2003. All one has to do is review

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the public comments contained in the “Citizens Plan Summary – Riverside General Plan Program” (September 13, 2003) to see that a large majority of the comments submitted regarding Overlook Parkway were in opposition. Nothing in the EIR does anything to address or mitigate the issues raised in these purportedly “important” scoping sessions. Connecting Overlook Parkway will have significant environmental impacts that can not be mitigated on a “project by project basis” (EIR 5.4-26). The whole point of having a GP is to provide a master plan to implement the important goals outlined in the plan.

Managing on a case-by-case or project-by-project basis creates a powerful loophole for developers with connections to City Hall. This language provides special interests with the arbitrary/nebulous language necessary to work around the defined objectives of the plan.

The proposed GP City of Riverside must provide mitigation above and beyond the programmatic level for the increased population, traffic, and loss of wildlife that will result if Overlook Parkway is to be extended.

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More Comments on the Hawarden Hills Specific Plan

The current General Plan incorporated *Alternative B of the Hawarden Hills Study* dated December 1976. The *Hawarden Hills Study* was adopted April 5, 1979 under City Council Resolution Number 13073 and later incorporated into the GP.

Under the newly proposed GP (*Hawarden Hills* section of the *Land Use and Urban Design Element*) the *Hawarden Hills Specific Plan* and *Alternative B of the Hawarden Hills Study* are removed from the plan. These plans are the heart and soul of many decades of work by the Citizen’s of Riverside to preserve and protect our hillsides and arroyos. The loss of these measures violates Measure R and Proposition C in that it weakens and does not increase the protection afforded to the RC and RA zones. This amounts to an amendment of Measure R and Proposition C without a vote of the people.

Respectfully submitted,

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Please communicate responses to comments to both addresses



10. Richard Block, Friends of Riverside's Hills. January 3, 2005.

Response 10-1

These comments are introductory in nature and require no direct response.

Response 10-2

The comment suggests that the policies implemented in the General Plan to reduce scenic impacts and which are relied upon in the Draft EIR be adopted as legally enforceable mitigation measures. The policies in the General Plan are not identified as measures that are required to mitigate impacts. Rather, the analysis indicates that the long-term implementation of policies will avoid impact or ensure a less than significant impact. This approach reflects the programmatic nature of the Project and the EIR. Where follow-up policy actions cannot be clearly identified, the EIR includes mitigation measures. All General Plan policies will be part of the General Plan Implementation Plan required by State law (Government Code Section 65400), and in the Implementation Plan, the City will identify for each policy one or more strategies, termed "tools", that the City will pursue over the long term to implement that policy. In addition to identifying the tools, the Implementation Plan will indicate which City agency will be responsible for effectuating the policy, the funding source and potential cost, and the time frame to complete action (which could be ongoing over the life of the General Plan). As part of both the annual budgeting process and annual review of the General Plan, City department staff and decision makers – and the public through the public hearing process – will determine whether particular policies have already been implemented and which require action over the upcoming year. This process will allow decision makers and the public to check and ensure implementation on an annual basis. Given the programmatic nature of the EIR and the long-term time frame for the General Plan, the policy statements and Implementation Plan serve as effective and appropriate means of addressing any potential impacts.

Response 10-3

The comment suggests that the policies implemented in the General Plan to reduce agricultural impacts and which are relied upon in the Draft EIR be adopted as legally enforceable mitigation measures. Refer to Response 10-2, which states that over the long term, the implementation of policies in the General Plan will avoid or ensure less than significant impacts. This approach is appropriate for a Program EIR.

Response 10-4

The comment suggests that the Draft EIR include mitigation measures that discourage disking as a form of weed abatement and fire control and which prohibit mowing of vegetation to a minimum height of three inches, citing South Coast Air Quality Management District (AQMD) Rule 403. This is a Program EIR that addresses a broader, citywide context. The measure recommended is more appropriately addressed at the project level. All projects are required to comply with all applicable AQMD regulations at the time development is proposed. Also, development projects that involve grading are required to

comply with the provisions of the City's grading ordinance (Title 17 of the Municipal Code), which include provisions for replanting.

Response 10-5

The comment suggests that the Draft EIR include mitigation measures requiring electrical hook-ups and toxic air contaminates studies for proposed warehouse facility projects in the City. The measure recommended is more appropriately addressed at the project level. The City notes that regulations in the updated Zoning Code require conditional use permits for large warehousing facilities, and conditions can be applied as needed to address project-specific impacts.

Response 10-6

The comment suggests that the Draft EIR include mitigation measures requiring a trip reduction plan for all proposed projects that are expected to employ more than 100 persons and require all development projects to reduce 80 percent of PM₁₀ emissions during construction. The SCAQMD has repealed trip-reduction as a means of addressing air quality impacts. With regard to PM₁₀ emissions in general, the Air Quality Element includes numerous policies to address this regional concern. This is a Program EIR that addresses a broader, citywide context. The measure recommended is more appropriately addressed at the project level.

Response 10-7

The comment suggests that the policies implemented in the General Plan to reduce air quality impacts and which are relied upon in the Draft EIR be adopted as legally enforceable mitigation measures. Refer to Response 10-2, which states that over the long term, implementation of policies in the General Plan will avoid or ensure less than significant impacts.

Response 10-8

The comment suggests that the policies implemented in the General Plan to reduce biological resources impacts and which are relied upon in the Draft EIR be adopted as legally enforceable mitigation measures. Refer to Response 10-2, which states that the long term implementation of policies in the General Plan will avoid or ensure less than significant impacts.

Response 10-9

The comment suggests that the Draft EIR include mitigation measures that require wetland delineation studies and detailed biological assessments for specific projects proposed in the City. The two mitigation measures requested by the commentor requiring wetland delineation studies and detailed biological assessments are already a component of CEQA requirements. These represent standard City practices that are applied on a project-specific basis.

Response 10-10

The comment suggests that the Draft EIR include mitigation measures that prohibit development within the arroyos and tributaries. On the General Plan Land Use Policy Map, arroyos are designated Open Space/Natural Resources, which limits encroachment. The General Plan Open Space and Conservation Element addresses arroyos extensively beginning on page OS-17, and the grading ordinance (Title 17 of the Municipal Code) further provides protection of the arroyos consistent with Proposition R and Measure C.

Response 10-11

The comment suggests that the policies implemented in the General Plan to reduce cultural resources impacts and which are relied upon in the Draft EIR be adopted as legally enforceable mitigation measures. Refer to Response 10-2, which states that long term implementation of policies in the General Plan will avoid or ensure less than significant impacts. The CEQA process required for individual projects will provide for identification of cultural resources and appropriate project-specific mitigation.

Response 10-12

The comment suggests that the policies implemented in the General Plan to reduce geology and soils impacts and which are relied upon in the Draft EIR be adopted as legally enforceable mitigation measures. Refer to Response 10-2, which states that long-term implementation of policies in the General Plan will avoid or ensure less than significant impacts. The CEQA process required for individual projects will provide for identification of any geologic/soils constraints and appropriate project-specific mitigation.

Response 10-13

The comment suggests that the Draft EIR include mitigation measures that require site-specific slope analysis for projects within specific slope ranges proposed in the City. The two mitigation measures requested by the commentor requiring slope analyses are already a component of CEQA requirements and are required by the City as part of the development review process. As these represent standard practices of the City, no mitigation is required.

Response 10-14

The comment suggests that the policies implemented in the General Plan to reduce hazards and hazardous materials impacts and which are relied upon in the Draft EIR be adopted as legally enforceable mitigation measures. Refer to response 10-2 for an explanation that policies in the General Plan are not identified as measures to mitigate impacts; rather, long-term implementation of policies in the General Plan will avoid or ensure less than significant impacts. The CEQA process required for individual projects will provide for identification of any hazardous materials impacts/concerns and appropriate project-specific mitigation.

Response 10-15

The comment suggests that the policies implemented in the General Plan to reduce hydrology and water quality impacts and which are relied upon in the Draft EIR be adopted as legally enforceable mitigation measures. Refer to Response 10-2, which states that long-term implementation of policies in the General Plan will avoid or ensure less than significant impacts. The CEQA process required for individual projects will provide for identification of any hydrology/water quality impacts and appropriate project-specific mitigation.

Response 10-16

The comment suggests that the Project – and specifically the update Zoning Code – conflicts with Proposition R and Measure C and therefore results in a significant impact due to such conflict. The City has determined that the policies contained in the General Plan and implemented through the Zoning Code are consistent with Proposition R and Measure C.

Specifically, with regard to the Overlook Parkway connection that is part of the current General Plan and better defined in the Draft General Plan, the intent of this connection is to serve local traffic. With regard to the arroyos as wildlife movement corridors, see Response 10-10. The arroyos currently serve and will continue to serve many functions, including as wildlife movement corridors.

Response 10-17

The comment suggests that the policies implemented in the General Plan to reduce land use and planning impacts and which are relied upon in the Draft EIR be adopted as legally enforceable mitigation measures. Refer to Response 10-2, which states that long-term implementation of policies in the General Plan will avoid or ensure less than significant impacts. The CEQA process required for individual projects will provide for identification of any direct land use impacts and appropriate project-specific mitigation.

Response 10-18

The comment suggests that the policies implemented in the General Plan to reduce mineral resources impacts and which are relied upon in the Draft EIR be adopted as legally enforceable mitigation measures. Refer to Response 10-2, which states that long-term implementation of policies in the General Plan will avoid or ensure less than significant impacts rather than serve as measures to mitigate impacts. The CEQA process required for individual projects will provide for identification of any mineral resource impacts and appropriate project-specific mitigation.

Response 10-19

The comment suggests that the policies implemented in the General Plan to reduce noise impacts and which are relied upon in the Draft EIR be adopted as legally enforceable mitigation measures. The comment also makes recommendations about specific mitigation to include. Refer to Response 10-2, which states that long-term implementation of policies in the General Plan will avoid or ensure less than significant impacts. The CEQA process

required for individual projects will provide for identification of any localized noise impacts and appropriate project-specific mitigation.

Response 10-20

The comment suggests that the Draft EIR include mitigation measures that require construction noise reduction plans and acoustical analyses for all commercial and industrial development projects of five acres or more and residential projects of twenty acres or more. Given the programmatic, first-tier nature of this EIR, such a specific policy is not appropriate. Rather, the City will continue to follow its standard practice of requiring acoustical analyses for projects in areas of high noise exposure, as indicated in the General Plan Noise Element. Also, the Noise Ordinance provisions will continue to apply.

Response 10-21

The comment suggests that the policies implemented in the General Plan to reduce population and housing impacts and which are relied upon in the Draft EIR be adopted as legally enforceable mitigation measures. Refer to Response 10-2, which states that long-term implementation of policies in the General Plan will avoid or ensure less than significant impacts. The CEQA process required for individual projects will provide for identification of any population/housing impacts and appropriate project-specific mitigation.

Response 10-22

The comment states that the Zoning and Subdivision Codes, which implement the General Plan, directly induce substantial population growth. Growth inducement will not result: as noted, these codes are the mechanisms used to implement General Plan land use policy. These codes have been crafted to be consistent with the General Plan and to carry forward the policies for smart, managed growth. Land use policy looks to focus growth largely as infill development, and the Zoning Code will implement policy through the new mixed-use zoning districts. The Zoning Code does not reduce conditions for bonus densities but instead creates more stringent design and other requirements that must be achieved in order to a design-related density bonus to be granted. Such bonuses are within the limits of each General Plan land use category, the limits of which have not been changed for existing land use designations by this General Plan update.

Response 10-23

The comment states that mitigation measures should be added to implement “smart growth” principals and to create open space in return for higher densities allowed by the Project. As noted throughout the Land Use and Urban Design Element, the policies embody smart growth principles through encouragement of infill development and mixed-use projects. Since the Zoning and Subdivision Codes have been comprehensively revised to implement these policies, no mitigation measures are required. Further, the Zoning and Subdivision Codes encourage clustering as a means of preserving open space.

Response 10-24

The comment suggests that the policies implemented in the General Plan to reduce public services impacts and which are relied upon in the Draft EIR be adopted as legally enforceable mitigation measures. Refer to Response 10-2, which states that long-term implementation of policies in the General Plan will avoid or ensure less than significant impacts. The CEQA process required for individual projects will provide for identification of any public service impacts and appropriate project-specific mitigation.

Response 10-25

The comment states that a mitigation measure should be added to analyze the impacts to schools so that the City is able to accommodate the amount of students entering Riverside's schools and to minimize the fiscal impact placed on the school system. As discussed on page 5.13-19 of the EIR, SB50, now codified as California Government Code Section 65995, indicates that payment of school fees serves as adequate mitigation for any school impacts. No further analysis or mitigation is required.

Response 10-26

The comment states that a mitigation measure should be added to analyze the impacts to libraries so that the City is able to accommodate the number of books needed to minimize the impact placed on neighborhood libraries. As noted on page 5.13-23 of the Draft EIR, the City currently collects fees to fund library facilities and services. This voter-approved fee is scheduled to expire in 2012. Given that the life of the Project extends beyond this date and that no guarantee can be made that funds will continue to be collected, impact on library services is identified as significant and unavoidable. The City does not have the independent authority to extend the collection period but could choose to put the measure before voters at or near the current sunset period.

Response 10-27

The comment states that a mitigation measure should be added to analyze the impacts to community centers so that the City is able to accommodate the amount of community space needed by Riverside residents. The City currently has 10 community centers distributed throughout Riverside. Policies in the Public Facilities and Infrastructure Element direct the City to provide easy access to centers, which can be accomplished either through construction of new centers, joint-use agreements, and/or improved transportation connections to existing centers. As part of its strategic planning and annual budgeting processes, the City will continue to determine the most effective method of implementing this policy. Refer to Response 10-2, which states that long-term implementation of policies in the General Plan will avoid or ensure less than significant impacts on community centers.

Response 10-28

The comment suggests that the policies implemented in the General Plan to reduce recreation impacts and which are relied upon in the Draft EIR be adopted as legally enforceable mitigation measures. Refer to Response 10-2, which states that long-term implementation of policies in the General Plan will avoid or ensure less than significant

impacts. The Subdivision Code provides the City with the mechanism to acquire parkland or collect in-lieu fees to meet park standards for new development projects.

Response 10-29

The comment states that the size of Islander Park is incorrectly stated in the Draft EIR. Islander Park is 19.1 acres. This typographical error is hereby corrected. The correction does not change any of the analysis or conclusions contained in the EIR.

Response 10-30

The comment suggests that the policies implemented in the General Plan to reduce transportation and traffic impacts and which are relied upon in the Draft EIR be adopted as legally enforceable mitigation measures. The Master Plan of Roadways indicates how the circulation system will be built out to accommodate local traffic to the greatest extent possible, given the influences of regional traffic through Riverside. The EIR notes that even with full implementation of the plan, significant and unavoidable impacts will remain at several locations (Final EIR, p. 5.15-37).

The comment states that the proposed Plan will allow for “greater population growth than the present plan and ordinances.” The proposed Plan provides for more compact, infill development through smart growth principles and specifically, by accommodating growth within the developed City core rather than on the suburban fringe. This development approach takes advantage of the existing street system and encourages alternative modes of mobility, thus reducing traffic generation relative to the traditional suburban model on which Riverside has developed in the past.

With regard to using railroad grade separations to improve traffic flow, General Plan policies identify the City’s commitment to pursue grade separations citywide as a means of improving traffic safety, reducing congestion, and reducing noise impacts. However, such separations cannot be accomplished without the cooperation of the railroad companies and thus cannot be assumed in traffic modeling nor relied upon as mitigation. The City currently is aggressively pursuing grade separations and funding for such on a priority basis and will continue to do so to implement the stated policies.

With regard to establishing transportation impact fees beyond the current TUMF levels, the City has determined that the current TUMF fees are appropriate. If the City determines at a later date that the fees require adjustment, nexus studies must be conducted pursuant to State law to determine appropriate levels based upon actual infrastructure needs and costs.

Response 10-31

The comment suggests that a mitigation measure should be added that can mitigate individual project and cumulative traffic impacts to below a level of significance without the City needing to prepare a statement of overriding considerations. The EIR examines long-term impacts associated with build-out of the Project area. The analysis concludes that even with implementation of the Master Plan of Roadways, the City will experience LOS E and F conditions at selected locations, resulting in significant long-term traffic impacts. Individual projects will be required to examine local traffic impacts associated with that project and to mitigate impacts consistent with City objectives for LOS D conditions, except as may be

acceptable near freeway ramps and at other locations identified in the Circulation and Community Mobility Element. Given that regional traffic will contribute substantially to future conditions in Riverside, the City does not believe it to be feasible to include a mitigation measure that will require individual projects to completely mitigate cumulative traffic impacts. Long-term cumulative mitigation is the focus of the Circulation and Community Mobility Element, and the policies contained therein work toward minimizing traffic impacts while balancing these against other goals, such as neighborhood protection.

Response 10-32

The comment states that the alternatives considered are inadequately analyzed and suggests that a new alternative be analyzed which would balance mixed use with lower densities elsewhere, with public acquisition of relatively undevelopable land. The comment continues that this could be accomplished with further revisions to the Zoning and Subdivision Codes.

With regard to establishing policies to identify relatively undevelopable land as permanent open space, the City cannot to do this as a matter of public policy without identifying its clear intent to purchase such lands for full market value. Instead, the City has assigned very low residential densities to such areas consistent with Proposition R and Measure C.

With regard to the specific reference to Tiburon Knoll, this is private property which the City cannot designate as open space, as such action would result in inverse condemnation of the property, requiring renumeration to the property owner(s). With regard to a potential trail across this property, City staff has elected not to include such a trail on the Parks, Open Space and Trails Map in the Park and Recreation Element. The commentor can raise this issue as part of the public hearing process on the Draft General Plan for consideration by decision makers.

Response 10-33

The balance of the comments in the letter address specific proposed provisions of the updated Zoning and Subdivision Codes but generally do not raise environmental issues of concerns associated with such provisions. The commentor is encouraged to raise such concerns as part of the public hearing process on the Zoning and Subdivision Codes.

With regard to those comments that state that the EIR does not address the environmental effects of specific new provisions, such as the potential for density bonuses: the EIR is programmatic in nature and thus addresses as a whole the effects of adopting the General Plan, Zoning Code, Subdivision Code, Citywide Design Guidelines, and Magnolia Avenue Specific Plan. Issues such as the density bonus are accounted for in the comprehensive, long-term approach to the analysis, which accounts for build-out pursuant to General Plan policies, as implemented to a great extent through the Zoning and Subdivision Codes. As any density bonuses for market-rate housing fall within the caps for each General Plan land use category, such possibilities are accounted for in the analysis. With regard to density bonuses for “lower income housing” (page 11 in the comment letter), which could allow for densities above the General Plan and Zoning Code limits, such projects represent a small percentage of the future overall number of units in the City and programmatically, can be considered as a counterbalance to market-rate units constructed below the density limits of the General Plan and Zoning Code.

Response 10-34

The extension of Overlook Parkway has been included as part of the City's General Plan at over 30 years, as stated in the 1994 General Plan EIR, and the current update continues the plan, with refinements. At this time, a specific, defined route for the extension has not been determined. The connection indicated in the General Plan is conceptual and part of the entire citywide circulation system. As part of the process to refine the route, the City will be required to conduct comprehensive environmental review, including biological resource studies and water quality studies, and will select an approach that minimizes environmental impact while achieving the circulation objectives set forth in the General Plan.

With regard to comment about public opposition to the extension made at the September 13, 2003 Citizens' Congress, that meeting was not a scoping meeting as defined by CEQA but was a public open house for the General Plan program designed to solicit public comments on all General Plan issues. This open house represented just one public engagement forum of a two-year General Plan process. The General Plan Citizens' Advisory Committee (CAC) took into account all public comments made during the process in drafting all of the recommendations contained in the Draft General Plan, including the Overlook Parkway extension, which was discussed in detail at two CAC meetings. As part of the public hearing process, the City Council will make the final determination regarding Overlook Parkway.

Response 10-35

The comment regarding the Hawarden Hills Specific Plan does not address the content of the EIR; thus, no response is necessary.



LETTER 11

Raymond F. Hicks
Region Manager
Public Affairs Department

January 3, 2005



Mr. Craig Aaron
Principal Planner
City of Riverside Planning and Building Department
3900 Main Street, 3rd Floor
Riverside, CA 92522

Subject: Draft Environmental Impact Report (DEIR) for the General Plan 2025 Program

Dear Mr. Aaron:

Thank you for the opportunity to review the DEIR. This is an extremely important aspect of development projects, and we appreciate being included as a partner with the City of Riverside in your planning for the future.

There is no indication from the packet of any specific impacts to the Southern California Edison (SCE) facilities.

In the event the project impacts SCE facilities or its land related rights, please forward five (5) sets of plans depicting SCE's facilities and associated land rights to the following location:

11-1

Real Estate Operations
Southern California Edison Company
14799 Chestnut Street, Westminster, CA 92683

Within 10 days after receiving the plans, the developer or their agent will be contacted by a representative from Real Estate Operations.

Thank you,

Ray Hicks
Region Manager
Southern California Edison

1351 East Francis St.
Ontario, CA 91761-5715
909-930-8446/PAX 16446
Fax 909-930-8407
raymond.hicks@sce.com

11. Ray Hicks, Regional Manager, Public Affairs Department, Southern California Edison, January 3, 2005.

Response 11-1

The comment suggests that the City submit plans for Southern California Edison's (SCE) review if any proposed development project may pose an impact to any SCE facility or its associated land. The Project is the adoption and implementation of the updated General Plan, Zoning Code, Subdivision Code, Citywide Design Guidelines and Magnolia Avenue Specific Plan. These documents will be used to guide future development and growth in the Riverside Planning Area and do not propose specific development projects. Individual development projects pursuant to the adoption and implementation of the Project will be required to evaluate if the conditions at the specific project site pose an impact on SCE facilities or its land related impacts in accordance with the City's standard CEQA and project review processes.



Arnold
Schwarzenegger
Governor

LETTER 12

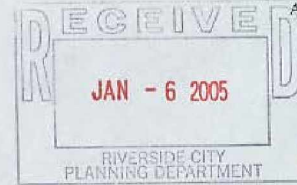
STATE OF CALIFORNIA

Governor's Office of Planning and Research
State Clearinghouse and Planning Unit



Jan Boel
Acting Director

January 4, 2005



Craig Aaron
City of Riverside Planning Department
3900 Main Street, 3rd Floor
Riverside, CA 92522

Subject: City of Riverside General Plan, Zoning Code, Subdivision Code, Citywide Design Guidelines and
Magnolia Avenue Specific Plan
SCH#: 2004021108

Dear Craig Aaron:

The State Clearinghouse submitted the above named Draft EIR to selected state agencies for review. The review period closed on January 3, 2005, and no state agencies submitted comments by that date. This letter acknowledges that you have complied with the State Clearinghouse review requirements for draft environmental documents, pursuant to the California Environmental Quality Act.

Please call the State Clearinghouse at (916) 445-0613 if you have any questions regarding the environmental review process. If you have a question about the above-named project, please refer to the ten-digit State Clearinghouse number when contacting this office.

Sincerely,

Terry Roberts
Director, State Clearinghouse

12-1

1400 TENTH STREET P.O. BOX 3044 SACRAMENTO, CALIFORNIA 95812-3044
TEL (916) 445-0613 FAX (916) 323-3018 www.opr.ca.gov

Document Details Report State Clearinghouse Data Base

SCH# 2004021108
Project Title City of Riverside General Plan, Zoning Code, Subdivision Code, Citywide Design Guidelines and
Lead Agency Magnolia Avenue Specific Plan
 Riverside, City of

Type EIR Draft EIR
Description The General Plan 2025 Program involves the adoption and implementation of the following:
 1. The City of Riverside General Plan 2025;
 2. Comprehensive revision of the City of Riverside Zoning Code (Title 19 of the Municipal Code) and the rezoning of properties to reflect new zone names;
 3. Comprehensive revision of the City of Riverside Subdivision Code (Title 18 of the Municipal Code);
 4. City-wide Design Guidelines; and
 5. The Magnolia Avenue Specific Plan.

Lead Agency Contact

Name Craig Aaron
Agency City of Riverside Planning Department
Phone (951) 826-5989 **Fax**
email
Address 3900 Main Street, 3rd Floor
City Riverside **State** CA **Zip** 92522

Project Location

County Riverside
City Riverside, Moreno Valley, Corona, Norco
Region
Cross Streets N/A
Parcel No. N/A
Township **Range** **Section** **Base** SB

Proximity to:

Highways 215, 60, 91
Airports Riverside Municipal, Flabob, MAR
Railways Metrolink, BNSF
Waterways Santa Ana River and various arroyos
Schools Riverside USD, Alvord USD
Land Use N/A

Project Issues Aesthetic/Visual; Agricultural Land; Air Quality; Archaeologic-Historic; Cumulative Effects; Drainage/Absorption; Economics/Jobs; Fiscal Impacts; Flood Plain/Flooding; Forest Land/Fire Hazard; Geologic/Seismic; Growth Inducing; Landuse; Minerals; Noise; Population/Housing Balance; Public Services; Recreation/Parks; Schools/Universities; Septic System; Sewer Capacity; Soil Erosion/Compaction/Grading; Solid Waste; Toxic/Hazardous; Traffic/Circulation; Vegetation; Water Quality; Water Supply; Wetland/Riparian; Wildlife

Reviewing Agencies Resources Agency; Regional Water Quality Control Board, Region 8; Department of Parks and Recreation; Native American Heritage Commission; Office of Emergency Services; Department of Fish and Game, Region 6; Department of Water Resources; Department of Conservation; California Highway Patrol; Caltrans, District 8; Caltrans, Division of Aeronautics

Date Received 11/18/2004 **Start of Review** 11/18/2004 **End of Review** 01/03/2005

Note: Blanks in data fields result from insufficient information provided by lead agency.

12. Terry Roberts, Director, State Clearinghouse. January 4, 2005.

Response 12-1

The comment states that the project has complied with State Clearinghouse review requirements for draft environmental documents pursuant to the California Environmental Quality Act. The comment is acknowledged, and no further response is required.



MWD

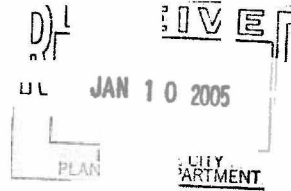
METROPOLITAN WATER DISTRICT OF SOUTHERN CALIFORNIA

Executive Office

LETTER 13

December 22, 2004

Mr. Craig Aaron
City of Riverside, Planning and Building Department
3900 Main Street, 3rd Floor
Riverside, California 92522



Dear Mr. Craig Aaron:

Draft Environmental Impact Report for the City of Riverside General Plan 2025 Program

The Metropolitan Water District of Southern California (Metropolitan) has reviewed a copy of the Draft Environmental Impact Report (EIR) for the City of Riverside General Plan 2025 Program (Project). The proposed Project is the adoption and implementation of the following programmatic documents: 1) Comprehensive update of the City of Riverside General Plan; 2) Comprehensive update of the City of Riverside Zoning Code (Title 19 of the Municipal Code of the City of Riverside) and the rezoning of properties to reflect new zone names; 3) Comprehensive update of the City of Riverside Subdivision Ordinance; 4) Adoption of Citywide Design Guidelines; 5) The Magnolia Avenue Specific Plan. The city of Riverside (City) is located in western Riverside County and is bounded on the north by the unincorporated Riverside County communities of Rubidoux and Jurupa and the City of Colton (San Bernardino County), on the east by the Riverside County and the city of Moreno Valley, to the south by unincorporated communities of Riverside County, and to the west by the Riverside County cities of Norco and Corona. The Project Planning Area consists of the corporate boundaries of the city of Riverside, the City's Northern Sphere of Influence and the near Southern (or proximate) Sphere of Influence. The "near Southern Sphere of Influence" encompasses lands from the City's southern border to the crest of the Cajalco Ridge, just south of Cajalco Road. The Planning Area does not include the "far Southern Sphere," which runs south from the crest of the Cajalco Ridge south to the Sphere boundary. The City adopted a General Plan for the far Southern Sphere in 1998; the Project proposes no changes to that plan. This letter contains Metropolitan's response to the Draft EIR as a potentially affected agency.

13-1

Metropolitan provided a comment letter dated March 17, 2004 (attached), in response to the Notice of Preparation for this Project. Metropolitan staff has reviewed the Draft EIR and has determined that our comments have not been adequately addressed.

13-2

Metropolitan owns and operates facilities within the boundaries of the City. Metropolitan's Upper Feeder Pipeline, Lower Feeder Pipeline, and Mills Filtration Plant are within the boundaries of the City. The Upper Feeder Pipeline is a 132-inch diameter pipeline located within a permanent easement right-of-way; and the Lower Feeder Pipeline is a 120-inch diameter

13-3

700 N. Alameda Street, Los Angeles, California 90012 • Mailing Address: Box 54153, Los Angeles, California 90054-0153 • Telephone (213) 217-6000

THE METROPOLITAN WATER DISTRICT OF SOUTHERN CALIFORNIA

Mr. Craig Aaron
 Page 2
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pipeline located within a fee-property right-of-way. Additionally, Metropolitan owns the Box Springs Feeder right-of-way property, which is also within the boundaries of the City. Metropolitan remains concerned with potential impacts to our facilities and fee-owned property that may occur as a result of the proposed Project. Specifically, Metropolitan is interested in potential changes in land use designation that may occur as a result of the proposed Project. Metropolitan must be allowed to maintain its rights-of-way and requires unobstructed access to our facilities and properties at all times in order to repair, replace, and maintain our system or add new facilities.

13-3

Metropolitan reiterates our request that the City consider Metropolitan's facilities and property in its planning and in the EIR, and avoid potential impacts that may occur due to the implementation of the proposed Project. In order to avoid impacts, Metropolitan requests that our pipeline, filtration plant, and property be assigned a land use designation that would not conflict with our operations and routine and/or emergency maintenance. The land use designation should ensure that development around Metropolitan's facilities and property is consistent with the express use of our pipelines and rights-of-way as public utilities.

Additionally, Metropolitan has the following specific comments on the General Plan and Draft EIR:

1. Figure LU-9, Land Use Policy Map: Metropolitan would like to reiterate that we are concerned with the Draft EIR's lack of consistency with the land uses adopted by the County of Riverside in their 2003 General Plan. In particular, Metropolitan's lands in and around Lake Mathews are shown incorrectly in the City's Sphere Boundary for the General Plan. Specifically, areas shown primarily as Open Space/Natural Resources and Kangaroo Rat Habitat within the City's General Plan should in fact be shown as Public Facilities, in order to correctly depict Metropolitan's land holdings/uses at Lake Mathews, as well as Western Municipal Water District's facilities at the easterly end of Lake Mathews. In addition, it appears that the land uses in general do not coincide with the various approved land uses in the County's Plan. The land use designations outside of the City boundaries but within the City's Sphere of Influence should be consistent with the General Plan adopted by Riverside County in October 2003. Metropolitan requests the following changes to the Draft EIR/General Plan:

13-4

- Lake Mathews should be shown as "Public Facilities."
- Western Municipal Water District's facilities, as well as the Cajalco Dam and Detention Basin - both situated near the intersection of El Sobrante Road and Cajalco Road - are inaccurately shown as "Kangaroo Rat Habitat." These need to be shown as "Public Facilities."

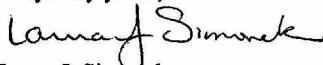
THE METROPOLITAN WATER DISTRICT OF SOUTHERN CALIFORNIA

Mr. Craig Aaron
Page 3
December 22, 2004

- Lands surrounding Lake Mathews are incorrectly shown as "Kangaroo Rat Habitat." This needs to be revised to show the land as "open space-conservation," which more accurately depicts the land and its intended use as a multi-species habitat conservation area.
 - Metropolitan also owns significant areas of operational lands south of El Sobrante Road and north of the Lake Mathews Dam, and also operational lands that straddle La Sierra on the west side of Lake Mathews. These areas need to be shown as "Public Facilities."
 - Metropolitan also recommends that the City coordinate directly with our GIS Team (please contact Mr. Stephen Hubbard at (213) 217-7764) to obtain the correct shape files that will accurately depict our land holdings and associated intended use as "Public Facilities."
2. Metropolitan also recommends that the City incorporate a Land Use Policy in the Utilities subsection of the Land Use Section of the General Plan. The policy should read as follows: "Policy LU: Ensure that development and conservation land uses do not infringe upon existing public utility corridors, including fee-owned rights-of-way and permanent easements, whose true land use is that of "public facilities." This policy will ensure that the "public facilities" designation governs over what otherwise may be inferred by the large-scale general plan map."
3. Figure PR-1, Parks, Open Space and Trails: This map shows a proposed County trail crossing the Upper Feeder pipeline north of El Sobrante Road, where the Upper Feeder is east of McAlister Road. Metropolitan is not aware of this proposed trail and the County (or City) must coordinate with Metropolitan to ensure such use is compatible with Metropolitan's operations of the Upper Feeder.

We appreciate the opportunity to provide input to your planning process and we look forward to receiving future environmental documentation, including a copy of the Final EIR, for this project. If we can be of further assistance, please contact Ms. Ana Reyes at (213) 217-7079.

Very truly yours,



Laura J. Simonek
Manager, Environmental Planning Team

LIM/rdl

(Public Folders/EPU/Letters/16-DEC-04A.doc – Craig Aaron)

Enclosures: 1) Metropolitan Comment Letter dated March 17, 2004
2) Final Draft Lake Mathews Area Land Use Plan

**MWD**

METROPOLITAN WATER DISTRICT OF SOUTHERN CALIFORNIA

LETTER 13A

COPY

March 17, 2004

Ms. Diane Jenkins
 City of Riverside, Planning Department
 3900 Main Street, 3rd Floor
 Riverside, California 92522

Dear Ms. Jenkins:

Notice of Preparation of a Draft Environmental Impact Report for the
 City of Riverside General Plan, Zoning Code, Subdivision Code,
Citywide Design Guidelines, and Magnolia Avenue Specific Plan

The Metropolitan Water District of Southern California (Metropolitan) has reviewed a copy of the Notice of Preparation (NOP) of a Draft Environmental Impact Report (EIR) for the City of Riverside General Plan, Zoning Code, Subdivision Code, Citywide Design Guidelines, and Magnolia Avenue Specific Plan (Project). The Project area consists of the corporate limits of the city of Riverside and properties within the City's sphere of influence considered the General Plan Planning Area. The City is located in western Riverside County and is bounded by the city of Colton in San Bernardino County to the north, the city of Moreno Valley in Riverside County to the east, unincorporated lands in Riverside County to the south, and the cities of Norco and Corona in Riverside County to the west.

The City's General Plan Update was last updated comprehensively in 1994. The current update involves comprehensive text changes to all required elements to incorporate the City's vision into an action-oriented document. The updated General Plan will include the following elements: Land Use and Urban Design, Circulation and Community Mobility, Housing, Arts and Culture, Education, Public Safety, Noise, Open Space, Public Facilities and Infrastructure, Historic Preservation, Air Quality. The City Zoning Code has not been comprehensively revised since its initial adoption in 1956, although it has been amended numerous times over the years to remain consistent with changes in State laws, and to respond to changing City needs and objectives. The Zoning Code revision involves: changes to reflect new land use policies contained in the updated General Plan; reorganization and reformatting to create a logical and intuitive organization to facilitate its use; updates to provide consistency with the most recent changes in State and federal laws and regulations; reduction in and reorganization of the residential, commercial and industrial zoning districts; and administrative procedures and processes will be simplified and further streamlined. The City's Subdivision Code was last updated comprehensively in 1996. The comprehensive revision intends to bring the City's Subdivision Ordinance up to date with current law and reformat the Code so it is consistent with

13A-1

Ms. Diane Jenkins

Page 2

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the new Zoning Code and easier for the public to use. The Design Guidelines document is a policy tool that will be used to visually communicate concepts expressed in the General Plan and Zoning Code. The Magnolia Avenue Specific Plan intends to create a comprehensive and detailed framework of objective, policies and implementation tools to guide growth and change along the City's most prominent local thoroughfare. This letter contains Metropolitan's response to the NOP as a potentially affected agency.

13A-1

Metropolitan owns and operates facilities within the boundaries of the City. Metropolitan's Upper Feeder Pipeline, Lower Feeder Pipeline, and Mills Filtration Plant are within the boundaries of the City. The Upper Feeder Pipeline is a 132-inch diameter pipeline located within a permanent easement right-of-way; and the Lower Feeder Pipeline is a 120-inch diameter pipeline located within a fee-property right-of-way. Additionally, Metropolitan owns the Box Springs Feeder right-of-way property, which is also within the boundaries of the City. Metropolitan is concerned with potential impacts to our facilities and fee-owned property that may occur as a result of the proposed Project. Specifically, Metropolitan is interested in potential changes in land use designation that may occur as a result of the proposed Project. Metropolitan must be allowed to maintain its rights-of-way and requires unobstructed access to our facilities and properties at all times in order to repair and maintain our system.

13A-2

Metropolitan requests that the City consider Metropolitan's facilities and property in its planning and in the Draft EIR, and avoid potential impacts that may occur due to the implementation of the General Plan Update, Zoning Code revision, City's Subdivision Ordinance comprehensive revision, Design Guidelines, and Magnolia Avenue Specific Plan. In order to avoid impacts, Metropolitan requests that our pipeline, filtration plant, and property be assigned a land use designation that would not conflict with our operations and routine and/or emergency maintenance. The land use designation should ensure that development around Metropolitan's facilities and property is consistent with the express use of our pipelines and rights-of-way as public utilities.

13A-3

Furthermore, Metropolitan is concerned about the Draft EIR's lack of consistency with the land uses adopted by the County of Riverside in their 2003 General Plan. In particular, Metropolitan's lands in and around Lake Mathews are shown incorrectly in the City's Sphere Boundary for the General Plan (see attached figure titled "Final Lake Mathews Land Use Plan"). Specifically, areas shown primarily as Open Space/Natural Resources and Kangaroo Rat Habitat within the City's General Plan should in fact be shown as Public Facilities, in order to correctly depict Metropolitan's land holdings/uses at Lake Mathews, as well as Western Municipal Water District's facilities at the easterly end of Lake Mathews. In addition, it appears that the land uses in general do not coincide with the various land uses in the County's Plan. Metropolitan requests that the City correct these discrepancies. Metropolitan would be willing to share GIS data with the City, if requested, to facilitate correcting the land use map.

13A-4

Metropolitan also requests that the City analyze the consistency of the proposed project with the growth management plan adopted by the Southern California Association of Governments

13A-5

Ms. Diane Jenkins
Page 3
March 17, 2004

(SCAG). Metropolitan uses SCAG's population, housing, and employment projections to determine future water demand.

13A-5

In addition, Metropolitan encourages projects within its service area to include water conservation measures. Water conservation, reclaimed water use, and groundwater recharge programs are integral components to regional water supply planning. Metropolitan supports mitigation measures such as using water efficient fixtures, drought-tolerant landscaping, and reclaimed water to offset any increase in water use associated with the proposed project.

13A-6

We appreciate the opportunity to provide input to your planning process and we look forward to receiving future environmental documentation, including a copy of the Draft EIR, for this project. If we can be of further assistance, please contact Ms. Ana Reyes at (213) 217-7079.

Very truly yours,

Original Signed By
Laura Simonek

Laura J. Simonek
Manager, Environmental Planning Team

LIM/rdl
(Public Folders/EPU/Letters/08-MAR-04C.doc – Diane Jenkins)

Enclosure: Final Lake Mathews Land Use Plan – Figure 3.9

13. Laura J. Simonek, Manager, Environmental Planning Team, Metropolitan Water District of Southern California. December 22, 2004.

Response 13-1

These comments are introductory in nature and require no direct response.

Response 13-2

The comment suggests that the comments submitted by the Metropolitan Water District of Southern California (MWD) during the NOP review period be responded to in this Response to Comments document. The NOP comments will be addressed following the responses to the above-referenced letter. Responses to the NOP comments are numbered 13A-1, 13A-2, etc.

Response 13-3

The comment suggests that the Project may have impacts to MWD's facilities and fee-owned property, including the facilities' rights-of-way and access. The Project does not involve any development activity. The Project is the adoption and implementation of the updated General Plan, Zoning Code, Subdivision Code, Citywide Design Guidelines, and Magnolia Avenue Specific Plan. These documents will be used to guide future development and growth in the Riverside Planning Area and do not propose specific development projects. Individual development and redevelopment projects pursuant to the adoption and implementation of the Project will be required to analyze potential affects on existing public facilities on a project-by-project basis in accordance with the City's standard CEQA and project review processes.

Response 13-4

The comment suggests that the land use designation for all of MWD's facilities and properties within the Planning Area be changed in order to be consistent with its use as a public facility. This comment does not raise any question about the analysis in the EIR. However, should the designations of Lake Mathews and/or the Cajalco Dam and Detention Basin be changed to Public Facilities as part of the public hearing process on the General Plan, such a change would not affect any of the analysis or conclusions in this EIR, as no change in development potential or population estimates would result.

Similarly, any change from the Kangaroo Rat Habitat designation to Open Space/Natural Resources would not change development potential or population estimates.

Response 13-5

The comment suggests that a policy be added to the Final EIR recommending that the City protect utility corridors in the Land Use section of the General Plan. Objective LU-9 and Policies LU-9.3 and LU-9.4 aim to minimize the impact to public facilities through proper land use planning. The City's development review practices for discretionary and ministerial land use permits currently include such review. No additional policies are required.

Response 13-6

The comment suggests that the agency having jurisdiction over the proposed County trail crossing MWD's Upper Feeder pipeline north of El Sobrante Road coordinate with MWD to ensure that the trail is compatible with MWD's operations. The County of Riverside is the agency responsible for trail crossing the Upper Feeder pipeline in the City Riverside. The City of Riverside will work with the County of Riverside once final plans are initiated for construction of the trail. As this is a first-tier, Program EIR, CEQA analysis of any future trail construction may be properly deferred until plans for the proposed trail are developed by Riverside County.

Response 13A-1

These comments are introductory in nature and require no direct response.

Response 13A-2

See Response 13-3.

Response 13A-3

See Response 13-4.

Response 13A-4

The comment states that the Sphere of Influence within the Planning Area is inconsistent with the County of Riverside's General Plan. Refer to responses to Comment Letter #6 for a response to the comment addressed in this letter.

Response 13A-5

The comment suggests that the City of Riverside analyze consistency of the proposed project with the growth management plan adopted by the Southern California Association of Governments. As stated in Section 5.9, Land Use and Planning, on page 5.9-17 and 5.9-18, the Project is consistent with all of SCAG's plans. The discussion is included below:

Table 1 of Appendix C compares specific policies of the Regional Comprehensive Plan and Guide and the Regional Transportation Plan (RTP). The Project is consistent with the following elements of SCAG plans:

- Growth Management Chapter Policies Related to Regional Growth Forecasts
- Growth Management Chapter Policies Related to the RCPG Goal to Improve the Regional Standard of Living
- Growth Management Chapter Policies Related to the RCPG Goal to Improve the Regional Quality of Life
- Growth Management Chapter Policies Related to the RCPG Goal to Provide Social, Political and Cultural Equity
- Core Regional Transportation Plan Policies
- Air Quality Chapter Core Actions

- Open Space Chapter Ancillary Policies Related to Outdoor Recreation, Public Health and Safety and Resource Production
- Water Quality Chapter Recommendations and Policy Options
- Regional Growth Principles

With implementation of and adherence to General Plan policies (listed in Table 1 of **Appendix F**), the Project's impact related to consistency with SCAG regional plans is less than significant.

Response 13A-6

The comment states that the Draft EIR should include water conservation measures. Section 5.8, Hydrology and Water Quality, includes an objective and numerous policies that aim to conserve water. As stated on page 5.8-9, Objective OS-10 recommends that the City "Preserve the quantity and quality of all water resources throughout Riverside," and most notably Policy OS-10.1 obligates the City to "Support the development and promotion of water conservation programs."

LETTER 14



Department of Toxic Substances Control

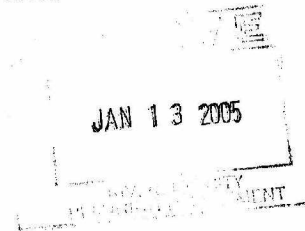


Alan C. Lloyd, Ph.D.
Agency Secretary
Cal/EPA

5796 Corporate Avenue
Cypress, California 90630

Arnold Schwarzenegger
Governor

January 10, 2005



Mr. Craig Aaron
Principal Planner
Planning and Building Department
County of Riverside
3900 Main Street, 3rd Floor
Riverside, California 92522

DRAFT ENVIRONMENTAL IMPACT REPORT FOR THE GENERAL PLAN 2025
PROGRAM FOR THE CITY OF RIVERSIDE, CALIFORNIA (SCH#2004021108)

Dear Mr. Aaron:

The Department of Toxic Substances Control (DTSC) has received your submitted Environmental Impact Report (EIR) for the above-mentioned project. The following project description is stated in your document: "The Project is the adoption and implementation of the following programmatic land use planning documents: 1. Comprehensive update of the City of Riverside General Plan. 2. Comprehensive update of the City of Riverside Zoning Code and the rezoning of properties to reflect new zoning district names and to respond to General Plan land use designation changes in 28 focus areas City-wide. 3. Comprehensive update of the City of Riverside Subdivision Ordinance. 4. Adoption of Citywide Design Guidelines and sign Guidelines. 5. Magnolia Avenue Specific Plan." Based on the review of the submitted document DTSC has comments as follow:

14-1

1) The EIR identifies that current or historic uses at the project site may have resulted in a release of hazardous wastes/substances. Your document states: "The Alark Hard Chrome site has been closed off and is currently undergoing cleanup activities. The UCR site was previously remediated."

2) The EIR identifies the known or potentially contaminated sites within the proposed Project area. For all identified sites, the EIR should evaluate whether conditions at the site may pose a threat to human health or the environment. Following are the databases of some of the regulatory agencies:

14-2

- National Priorities List (NPL): A list maintained by the United States Environmental Protection Agency (U.S.EPA).

♻️ Printed on Recycled Paper

Mr. Craig Aaron
January 10, 2004
Page 2

- Site Mitigation Program Property Database (formerly CalSites): A Database primarily used by the California Department of Toxic Substances Control.
 - Resource Conservation and Recovery Information System (RCRIS): A database of RCRA facilities that is maintained by U.S. EPA.
 - Comprehensive Environmental Response Compensation and Liability Information System (CERCLIS): A database of CERCLA sites that is maintained by U.S.EPA.
 - Solid Waste Information System (SWIS): A database provided by the California Integrated Waste Management Board which consists of both open as well as closed and inactive solid waste disposal facilities and transfer stations.
 - Leaking Underground Storage Tanks (LUST) / Spills, Leaks, Investigations and Cleanups (SLIC): A list that is maintained by Regional Water Quality Control Boards.
 - Local Counties and Cities maintain lists for hazardous substances cleanup sites and leaking underground storage tanks.
 - The United States Army Corps of Engineers, 911 Wilshire Boulevard, Los Angeles, California, 90017, (213) 452-3908, maintains a list of Formerly Used Defense Sites (FUDS).
- 14-2
- 3) The EIR identifies the mechanism to initiate any required investigation and/or remediation for any site that may be contaminated, and the government agency to provide appropriate regulatory oversight. If hazardous materials or wastes were stored and used at the site, a Site Assessment could determine if a release had occurred. If so, further studies should be carried out to delineate the nature and extent of the contamination, and the potential threat to public health and/or the environment should be evaluated. It may be necessary to determine if an expedited response action is required to reduce existing or potential threats to public health or the environment. If no immediate threat exists, the final remedy should be implemented in compliance with state regulations and policies.
- 14-3
- 4) All environmental investigations, sampling and/or remediation should be conducted under a Workplan approved and overseen by a regulatory agency

Mr. Craig Aaron
January 10, 2004
Page 3

that has jurisdiction to oversee hazardous waste cleanup. The findings and sampling result for each hazardous contaminant should be clearly summarized in a table in the EIR.

- 5) Proper investigation, sampling and remedial actions overseen by a regulatory agency, if necessary, should be conducted at the site prior to the new development or any construction.
- 6) If any property adjacent to the project site is contaminated with hazardous chemicals, and if the proposed project is within 2,000 feet from a contaminated site, then the proposed development may fall within the "Border Zone of a Contaminated Property." Appropriate precautions should be taken prior to construction if the proposed project is within a "Border Zone Property"
- 7) If building structures, asphalt or concrete-paved surface areas or other structures were being planned to be demolished, an investigation would be conducted for the presence of lead-based paints or products, mercury, and asbestos containing materials (ACMs). Your document states that if lead-based paints or products, mercury or ACMs were identified, proper precautions would be taken during demolition activities. Additionally, the contaminants should be remediated in compliance with California environmental regulations and policies.
- 8) The project construction may require soil excavation and soil filling in certain areas. Appropriate sampling is required prior to disposal of the excavated soil. If the soil is contaminated, properly dispose of it rather than placing it in another location. Land Disposal Restrictions may be applicable to these soils. Also, if the project proposes to import soil to backfill the areas excavated, proper sampling should be conducted to make sure that the imported soil is free of contamination.
- 9) Your document states that human health and the environment of sensitive receptors would be protected during the construction or demolition activities. A study of the site overseen by the appropriate government agency might have to be conducted to determine if there are, have been, or will be, any releases of hazardous materials that may pose a risk to human health or the environment.
- 10) If it is determined that hazardous wastes are, or will be, generated by the proposed operations, the wastes must be managed in accordance with the California Hazardous Waste Control Law (California Health and Safety Code, Division 20, chapter 6.5) and the Hazardous Waste Control Regulations (California Code of Regulations, Title 22, Division 4.5).

14-3

14-4

Mr. Craig Aaron
January 10, 2004
Page 4

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|-----|---|------|
| 11) | If it is determined that hazardous wastes are or will be generated and the wastes are (a) stored in tanks or containers for more than ninety days, (b) treated onsite, or (c) disposed of onsite, then a permit from DTSC may be required. If so, the facility should contact DTSC at (818) 551-2171 to initiate pre application discussions and determine the permitting process applicable to the facility. | 14-5 |
| 12) | If it is determined that hazardous wastes will be generated, the facility should obtain a United States Environmental Protection Agency Identification Number by contacting (800) 618-6942. | 14-6 |
| 13) | Certain hazardous waste treatment processes may require authorization from the local Certified Unified Program Agency (CUPA). Information about the requirement for authorization can be obtained by contacting your local CUPA. | 14-7 |
| 14) | If the project plans include discharging wastewater to storm drain, you may be required to obtain a wastewater discharge permit from the overseeing Regional Water Quality Control Board. | 14-8 |
| 15) | Your document states that there are contamination plumes in some inactive wells in the Bunker Hill Basin and states: "These contaminants are being mitigated through water treatment and other methods." If during construction/demolition of the project, if soil and/or groundwater contamination is suspected, construction/demolition in the area would cease and appropriate health and safety procedures should be implemented. | |
| 16) | Your document states: "Both the General Plan and the Zoning Code retain Agricultural land use designations; no land previously designated for agriculture has been re-designated for another use." If the site was used for agricultural activities onsite soils might contain pesticides, and agricultural chemical residue. If part of the site was used for dairy and stable industry operations, methane testing might have to be conducted. If so, activities at the site may have contributed to other soil and groundwater contamination. Proper investigation, and remedial actions, if necessary, should be conducted under the oversight of and approved by a government agency at the site prior to construction of the project. | 14-9 |

DTSC provides guidance for cleanup oversight through the Voluntary Cleanup Program (VCP). For additional information on the VCP, please visit DTSC's web site at www.dtsc.ca.gov.

Mr. Craig Aaron
January 10, 2004
Page 5

If you have any questions regarding this letter, please contact Ms. Teresa Hom, Project Manager, at (714) 484-5477 or email at thom@dtsc.ca.gov.

Sincerely,



Greg Holmes
Unit Chief
Southern California Cleanup Operations Branch - Cypress Office

cc: Governor's Office of Planning and Research
State Clearinghouse
P.O. Box 3044
Sacramento, California 95812-3044

Mr. Guenther W. Moskat, Chief
Planning and Environmental Analysis Section
CEQA Tracking Center
Department of Toxic Substances Control
P.O. Box 806
Sacramento, California 95812-0806

CEQA #1013

14. Greg Holmes, Unit Chief, Southern California Cleanup Operations Branch – Cypress Office, Department of Toxic Substances Control. January 10, 2005.

Response 14-1

These comments are introductory in nature and require no direct response.

Response 14-2

The comment states that the Draft EIR needs to identify and determine whether current or historic uses at the “project site” have resulted in any release of hazardous wastes/substances. Because the EIR addresses the entire City, no “project site” in the usual context in which Department of Toxic Substances Control (DTSC) reviews a proposal exists. Rather, the information is addressed on a citywide basis.

The Project does not involve any development activity. The Project is the adoption and implementation of the updated General Plan, Zoning Code, Subdivision Code, Citywide Design Guidelines and Magnolia Avenue Specific Plan. These documents will be used to guide future development and growth in the Riverside Planning Area and do not propose specific development projects. Individual development and redevelopment projects pursuant to the adoption and implementation of the Project will be required to determine the presence or historic use of hazardous wastes/substances at the specific project site on a project-by-project basis in accordance with the City’s standard CEQA and project review processes.

Response 14-3

The commentor recommends that the EIR identify the mechanism to initiate any required investigation/remediation for any site that may require remediation, and which government agency will provide appropriate regulatory oversight. Furthermore, if during construction of the project, soil contamination is suspected, construction in the area should stop, and appropriate health and safety procedures should be implemented.

The project does not involve any development activity. The Project is the adoption and implementation of the updated General Plan, Zoning Code, Subdivision Code, Citywide Design Guidelines and Magnolia Avenue Specific Plan. These documents will be used to guide future development and growth in the Riverside Planning Area and do not propose specific development projects. Individual development projects pursuant to adoption and implementation of the Project will be required to comply with DTSC regulations if soil contamination is suspected and follow all DTSC procedures for investigation and/or remediation on a project-by-project basis, including work necessitating a Workplan or a site within a “Border Zone Property.”

Response 14-4

See Response 14-3. Additionally, all future wastes will be managed in according with the California Hazardous Waste Control Law, the Hazardous Waste Control Regulations and CEQA.

Response 14-5

See Response 14-3. Additionally, DTSC will be contacted to initiate the permitting process for wastes on a project-by-project basis.

Response 14-6

See Response 14-3. Additionally, for specific development projects involving hazardous wastes, applicants will be required to contact the Environmental Protection Agency as projects are initiated.

Response 14-7

See Response 14-3. Additionally, the Riverside Fire Department's Hazardous Materials Response Unit and the Certified Unified Program Agency (CUPA) both regulate hazardous waste treatment in the City. Individual projects will require authorization from the City of Riverside's CUPA in order to conduct hazardous waste treatment.

Response 14-8

See Response 14-3. Additionally, specific development projects discharging wastewater to storm drains will be required to obtain a wastewater discharge permit per State Water Quality Control Board and City stormwater regulations, as stated in the Final EIR on page 5.8-6.

The City will require that each individual development project complies with existing State Water Quality Control Board and City stormwater regulations, including compliance with NPDES requirements related to construction and operation measures to prevent erosion, siltation and transport of urban pollutants. The Santa Ana Drainage Area Management Plan provides a selection of Best Management Practices (BMPs), as required by NPDES, which are specific to the Santa Ana River watershed. Refer to Mitigation Measure HW-1 below for a list of NPDES regulations to which new development projects must adhere. All new developments will undergo individual City review and will be required to comply with the RWQCB NPDES Permit No. CAG998001, which sets forth BMPs for new development and redevelopment projects.

Response 14-9

See Response 14-3.



California Regional Water Quality Control Board

Santa Ana Region



Alan C. Lloyd, Ph.D.
Agency Secretary

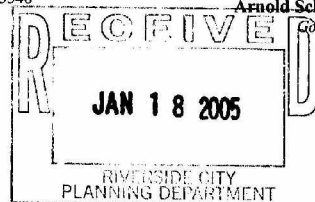
3737 Main Street, Suite 500, Riverside, California 92501-3348
Phone (951) 782-4130 - FAX (951) 781-6288
<http://www.waterboards.ca.gov/santaana>

Arnold Schwarzenegger
Governor

January 18, 2005

LETTER 15

Craig Aaron, Principal Planner
City of Riverside Planning and Building Department
3900 Main Street, 3rd Floor
Riverside, CA 92522



DRAFT ENVIRONMENTAL IMPACT REPORT, CITY OF RIVERSIDE GENERAL PLAN 2025 UPDATE, RIVERSIDE COUNTY, STATE CLEARINGHOUSE NUMBER #2004021108

Dear Mr. Aaron:

Staff of the Regional Water Quality Control Board, Santa Ana Region (RWQCB), has reviewed the City of Riverside's Draft Environmental Impact Report (DEIR), Volumes I and II, for its pending General Plan 2025 Program (project). The City is in the process of updating its General Plan for its corporate area and two Spheres of Influence (SOIs). The project excepts its "far Southern sphere" SOI for which a General Plan was adopted in 1998. We commend the City on the document's overall comprehensive view toward resolving planning issues in most sectors of the City and SOIs. The updated General Plan will guide implementation of development, use of open space, and accommodation of a large population increase for Riverside through 2025. While we were unable to comment on the March 2004 Notice of Preparation, we request that the following comments be considered when preparing the final EIR:

15-1

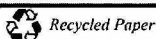
1. The expansion of a city carries incremental effects that are "cumulatively considerable" and pose a "potentially significant impact" on the environment. There is widespread experience that an increase of disturbed, developed, and paved areas has the tendency to substantially impact and impair water quality standards. Aside from the legally required "no project alternative," the "25% Reduction Alternative" for city growth and operation appears to lessen adverse impacts to water quality standards, i.e., water quality objectives and beneficial uses expressed in the RWQCB's Water Quality Control Plan (Basin Plan). DEIR Section 7.0 states that "hydrological impacts" may be reduced by the 25% Reduction Alternative and that reduced impervious coverage throughout the entire project area could increase area available for groundwater recharge. Project alternatives leading to decisions that are most protective of water-quality beneficial uses are preferred, such as those that limit development in urban fringes where surface water beneficial uses persist. These alternatives should be elaborated on in the EIR in terms of how they impact water quality standards, and exhibited with large-scale maps of the affected project areas. Antidegradation policies such as the State Water Resources Control Board's (SWRCB) Resolution No. 68-16) and the federal antidegradation policy (40 CFR 131.12) should also be discussed in the EIR.

15-2

2. The City must incorporate the requirements of Riverside County Areawide Urban Runoff Waste Discharge Requirements (RWQCB Order No. R8-2002-0011, NPDES No. CAS 618033), also known as the Riverside County Municipal Separate Storm Sewer Systems (MS4) Permit, into the General Plan to the extent necessary to ensure consistent implementation of the MS4 permit within the City and its SOI. The City is a co-permittee in this permit.

15-3

California Environmental Protection Agency



3. In accordance with Clean Water Act (CWA) Section 303(d), Santa Ana River Reaches 3 and 4 (Prado Dam to the San Jacinto Fault) are listed as impaired by pathogens and therefore TMDLs must be established for discharges to these reaches. The final EIR should fully reflect that implementation of the MS4 controls on urban runoff and other measures will be necessary and required to comply with pending pathogen Total Maximum Daily Loads (TMDLs) for discharges to these reaches of the river. Additionally, the Orange Terrace Parkway enclave of Riverside appears to be within the San Jacinto Watershed, tributary to Canyon Lake and Lake Elsinore. Development in this area must comply with TMDLs for nutrients (phosphorus and nitrogen) and pathogens (bacteria) entering Canyon Lake. The nutrient TMDL for Canyon Lake has been adopted by the Regional Board and action on a pathogen TMDL is projected for 2006.
4. Appropriate Best Management Practices (BMPs) must be developed and implemented to control the discharge of pollutants both during construction and for the life of a project. Post-construction BMPs must address all pollutant loads carried by dry weather runoff and first-flush storm water runoff from an entire project. The EIR should reflect that the Water Quality Management Plan required by the Riverside County MS4 permit is now in effect, and that all development must conform to the Plan's provisions. BMPs that utilize the principles of low impact development (LID) should be encouraged by the EIR.
5. The EIR must include provisions to advise the City's development, construction and business communities of the need to comply with several permit programs, including:
 - a. The General Permit for Discharges of Storm Water Associated with Construction Activity (Construction General Permit, 99-08-DWQ) for individual projects occurring on an area of one or more acres. A Notice of Intent (NOI) with the appropriate fees for coverage of the project under this Permit must be submitted to the SWRCB at least 30 days prior to the initiation of construction activity at the site. Information about this permit program can be found at <http://www.swrcb.ca.gov/stormwtr/construction.html>.
 - b. A National Pollutant Discharge Elimination System (NPDES) permit and waste discharge requirements for projects that will have dewatering or other wastewater discharges to surface waters of the state. RWQCB Order No. R8-2003-0061, NPDES No. CAG998001, a regional general *de minimus* permit, is available for most such discharges. Order No. R8-2003-0061 may be reviewed at <http://www.swrcb.ca.gov/rwqcb8/pdf/03-61>. Waste discharge requirements may also be required for discharge of wastes to land. Further information can be obtained by contacting the RWQCB Regulations Section staff at (951) 782-4130.
 - c. A Clean Water Act Section 401 Water Quality Standards Certification from the Regional Board for any project that causes material to be dredged from or filled into waters of the United States, i.e., surface waters or tributaries thereto, where these waters fall under the jurisdiction of the United States Army Corps of Engineers (ACOE) and a CWA Section 404 permit is required. **Early consultation with Regional Board staff concerning potential Section 401 certification issues is strongly suggested.** Information concerning Section 401 certification can be found at the Regional Board's website, www.swrcb.ca.gov/rwqcb8/html/401.html. Where the ACOE rules that a water body does not fall under their jurisdiction, as with

15-5

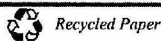
California Environmental Protection Agency



Recycled Paper

- potential cases of vernal pools or other isolated wetlands in the project area, the Regional Board may still determine that waste discharge requirements are necessary for protection of waters of the State. A Streambed Alteration Agreement from the California Department of Fish and Game may be necessary as well. 15-5
6. Impacts to water quality standards of channels and other drainages should first and foremost be avoided by development where possible. Where that is not practicable, impacts to these waters should be minimized. Such disturbance requires mitigation (beyond simply the acquisition of permits) that, at a minimum, replaces the full water quality function and value of the impacted water. These impacted water bodies include the nine primary natural channels that are identified as traversing the planning area. We cite Mockingbird Canyon and Sycamore Canyon as recent areas within the City and its SOIs where projects must mitigate for unavoidable direct and cumulative water impacts on water quality beneficial uses. 15-6
7. The DEIR states that the two ends of Overlook Parkway will not be connected across the Alessandro Arroyo, which we believe to be a positive, well-considered avoidance of a major drainage. However, the problematic Alessandro Arroyo/Overlook Parkway portion of Riverside has become a "marbled" mix of development, natural drainages, and riparian habitat. The EIR should emphasize that compliance with zoning requirements, specific plan provisions or any other components of the development process does not convey approval to place or remove fill within drainages without prior CWA Section 401 water quality standards certification issued by our office, or a comparable regulatory action, and other appropriate permitting. We understand that stormflows from tributary, impervious areas are eroding these drainages. Further, the area supports wildlife habitat water quality beneficial uses, including that for several sensitive species. The EIR should consider how best to protect these beneficial uses throughout this parkway area. 15-7
8. This office consistently receives plot plans, lot modifications, and determinations of negative declarations for tract maps in the Overlook Parkway/Alessandro Arroyo Area asserting that little or no environmental impact on water quality is posed by each project. We believe that projects in this area have the high potential to incrementally and accumulatively affect apparent ACOE jurisdictional waters that support water quality beneficial uses. Therefore, we suggest that the EIR call for a comprehensive strategy to address the cumulative impact that residential projects throughout this eastern portion of Riverside have on local hydrology and water quality beneficial uses.
9. We believe that the EIR should lead to a General Plan that is quite restrictive on development that proposes to rely on onsite subsurface disposal systems for waste disposal, in deference to connecting any new project to sewer. The EIR should emphasize that on-site subsurface disposal systems (OSDS), i.e., septic tank installations, within the project area must observe the Santa Ana RWQCB's minimum lot size requirements of one-half acre per subsurface disposal system. 15-8
10. No waste material may be discharged to any drainage areas, channels, streambeds, or streams. Spoil sites must not be located within any streams or where spoil material could be washed into a waterbody. BMPs must be deployed around spoils at all times. 15-9
11. The General Plan's overall Project will result in an increase in the amount of impervious area covered with pavement, parking lots, or structures. This will alter the rate and 15-10

California Environmental Protection Agency



Chris Aaron

- 4 -

January 18, 2005

volumes of groundwater recharge and surface water runoff. Post-development storm water runoff flow rates (Q) must not substantially differ from the pre-development Q, or on-site/downstream erosion with downstream sedimentation impacts can occur. The EIR should recommend development and construction project guidelines designed to protect, and if possible improve, the quality of underlying groundwater subbasins and management zones. We encourage the use of grassed swales and pervious materials for runoff channels and parking areas to infiltrate more storm water runoff into underlying groundwater aquifers. Studies have shown that such swales filter nutrients, total suspended solids, and metals from impacted runoff. For parking areas, we encourage the use of porous pavement systems that contain an underlying stone reservoir to temporarily store surface runoff, allowing it to infiltrate into the subsoil.

15-10

12. Areas of native vegetation should be preserved and protected to the maximum extent possible, and clearing should be strictly limited. Among other water quality and environmental benefits, native vegetation is effective at reducing slope erosion, filtering runoff, and providing habitat for native animal species. Therefore, we encourage the proactive replanting and hydroseeding of native vegetation in most operations.

15-11

13. By facilitating wildlife movement through riparian corridors, the Basin Plan's wildlife habitat beneficial uses are served. To avoid impeding wildlife movement, roadways or pipelines should be carried over ravines, arroyos, and slope drainages by bridges or wide, arched culverts. A policy of considering wildlife corridors should be supported by measures that require generous mitigation for construction impacts to natural drainages and other surface waters of the state and of the United States. This policy support may lead to streamlining the issuance of CWA 401 water quality standards certifications, or waste discharge requirements. The preservation of natural drainage systems, water bodies, and slopes reduces impacts to water quality and may lessen development's impact on water quality standards. Established native riparian vegetation, along and within broad flood plains and drainage systems, flanked by adequately vegetated upland buffer areas, will capture storm flows and thereby lessen erosion and sedimentation, and consequently protect water quality standards.

15-12

If you have any questions, please contact me at (951) 782-3234, or Glenn Robertson of my staff at (951) 782-3259.

Sincerely,

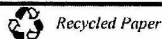


Mark G. Adelson, Chief
Regional Planning Programs Section

cc: Scott Morgan – State Clearinghouse

Q: Planning/Groberts/Letters/CEQA/DEIR- City of Riverside- General Plan Jan 2005

California Environmental Protection Agency



15. Mark G. Adelson, Chief, Regional Planning Programs Section, Santa Ana Region, California Regional Water Quality Control Board. January 18, 2005.

Response 15-1

The comment commends the City of Riverside on the Draft EIR's overall comprehensive view toward resolving planning issues within the Planning Area. The comment is acknowledged, and no further response is required.

Response 15-2

The comment recommends that the alternatives analyzed in the EIR include more detail about reduced water quality impacts, such as maps of affected areas, and that the EIR discuss antidegradation policies. Since the "25% Reduction Alternative" is conceptual only and assumes reduced growth citywide, there is no "location" where impervious surface coverage could be protected over the long term with this Alternative. The City notes that the focus of General Plan policy is to encourage infill development rather than continue to allow suburban densities in the "fringe," thus achieving the open space protection objectives promulgated by MWD in its comments.

The General Plan includes many policies that will work to reduce degradation of water quality. Policies OS-10.6 and OS-10.7 enforce Regional Water Quality Control Board (RWQCB) regulations regarding urban runoff and directs the City to work with RWQCB in the establishment and enforcement of urban runoff water quality standards (page 5.8-7 in the Final EIR). In addition, the City will evaluate all development projects for compliance with NPDES requirements, as stated in Policy-10.9 (page 5.8-8).

Response 15-3

The comment states that the City must incorporate the requirements of Riverside County Areawide Urban Runoff Waste Discharge Requirements into the General Plan to ensure consistent implementation of the MS4 permit (also known as the Riverside County Municipal Separate Storm Sewer Systems Permit) within the Planning Area since the City is a co-permittee of this permit. As stated on page OS-50 of the General Plan Open Space and Conservation Element, the City is involved in programs which are designed to reduce pollutants affecting water quality:

The City is a co-permittee with the County of Riverside in the National Pollution Discharge Elimination System (NPDES) program, which is designed to reduce pollutants in runoff. According to the NPDES permit, all new development projects and substantial rehabilitation projects are required to incorporate Best Management Practices (BMPs) as identified in the Santa Ana Regional Drainage Area Master Plan (SAR-DAMP) (page OS-50).

According to Order No. R8-2002-001 and NPDES No. CAS 618033, Waste Discharge Requirements for the Riverside County Flood Control and Water Conservation District, the County of Riverside, and the Incorporated Cities of Riverside County within the Santa Ana Region Areawide Urban Runoff, the MS4 permit was renewed on August 30, 2000. The

Permittees will develop a Water Quality Management Plan (WQMP) to identify Best Management Practices (BMPs), including design standards for source control and structural BMPs, that are to be applied when considering any map or permit for which discretionary approval is sought. The WQMP is intended to address regional and sub-regional source control and structural BMPs and to provide guidelines for site specific, "post-construction BMPs" to address management of urban runoff quantity and quality. The WQMP is to be submitted for review and approval by the California RWQCB Santa Ana Region, consistent with the criteria identified in Section VIII of the above-referenced Waste Discharge Requirements document in Subsections B.1., 2., and 3., including any project adding or creating 5,000 or more square feet of impervious surfaces, residential developments having 10 dwelling units or more of any type, industrial or commercial development where the land area is more than 100,000 square feet, automobile repair shops, restaurants of 5,000 square feet or more, hillside developments creating 10,000 square feet or more of impervious surfaces, developments creating 2,500 square feet or more of impervious surfaces adjacent to (within 200 feet) or discharging directly into waters supporting habitat that include plant or animal species designated as rare, threatened or endangered species, or parking lots of 5,000 square feet or more of impervious surfaces.

The primary objective of the WQMP, by addressing source control and structural BMPs, applied on a regional, sub-regional or site specific basis, is to ensure that the land use approval process of each co-permittee, such as the City of Riverside, will minimize pollutant loads in urban runoff from individual project sites for a map or permit for which discretionary approval is given. This objective may be achieved through source control and structural BMPs. As of January 1, 2005, the City requires all development fitting the criteria listed above to prepare individual WQMPs. In addition to individual WQMPs submitted by separate developments, the City is currently working with other jurisdictions in western Riverside County to prepare regional source control BMPs for submittal to the RWQCB by November 2005. The City will comply with implementation of the MS4 permit and any other NPDES permit.

Response 15-4

The comment recommends that the Final EIR include a full discussion of the MS4 controls on urban runoff and other measures required to comply with pending pathogen Total Maximum Daily Loads (TMDL) for discharges to the reaches of the Santa Ana River, and suggests that BMPs be developed and implemented to control the discharge of pollutants during the construction and operational phases of all projects. With implementation of Mitigation Measure HW-1 on page 5.8-11 of the Final EIR, the impacts to surface hydrology will be less than significant at the programmatic level.

HW-1 Prior to making land use decisions, the City will required project applicants to utilize available methods to estimate increases in pollutant loads and flows resulting from future development subject to NPDES regulations. In addition, project applicants shall demonstrate accomplishment of the following NPDES objectives:

- Use of structural and non-structural Best Management Practices (BMPs) to mitigate projected increases in pollutant loads and flows
- Minimized pollutant loading flow velocity during and after construction

- Minimized amounts of impervious surfaces and directly connected impervious surfaces
- Maximized on-site infiltration and runoff and temporary on-site retention areas
- Limited disturbance of natural water bodies and natural drainage systems
- Pollution prevention methods, source controls and treatment using small collection strategies located at or as close as possible to the source

Additionally, the Project does not involve any development activity. The Project is the adoption and implementation of the updated General Plan, Zoning Code, Subdivision Code, Citywide Design Guidelines and Magnolia Avenue Specific Plan. These documents will be used to guide future development and growth in the Riverside Planning Area and do not propose specific development projects. Individual development and redevelopment projects pursuant to the adoption and implementation of the Project will be required to comply with implementation of the Water Quality Management Plan, as required by the Riverside County MS4, and TMLDs for discharges to the Santa Ana River at the specific project site on a project-by-project basis in accordance with the City's standard CEQA and project review processes.

Refer to Response 15-3 for WQMPs required as a part of the MS4 permit.

Response 15-5

The comment suggests that the EIR include provisions to enable the City to comply with implementation of a General Permit for Discharges of Storm Water Associated with Construction Activity, a NPDES permit, and a Clean Water Act Section 401 Water Quality Standards Certification. Adherence to policies OS-10.6, OS-10.7, OS-10.9 and PF-4.2 lessen stormwater runoff impacts through compliance with RWQCB requirements and specifically, NPDES regulations. In addition to the policies in the General Plan, Section 17.16.010 of the Riverside Grading Code requires a NPDES General Permit for construction activity, a Notice of Intent (NOI) to be submitted to the State Water Board, and that a Storm Water Pollution Prevention Plan (SWPPP) be developed and implemented concurrent with the commencement of any grading activities. Any future project within the Planning Area must comply with these programs on an individual basis in accordance with the State Water Resources Control Board (SWRCB), Santa Ana RWQCB, and the U.S. Army Corps of Engineers (ACOE).

Response 15-6

The comment states that development adjacent to channels and other drainages should be avoided and mitigation beyond the acquisition of permits be implemented to minimize impacts to waters. This comment does not specifically address the analysis in the EIR. However, the comment is answered below.

The acquisition of permits is not mitigation for impacted waters. Conversely, the permits can require that mitigation is incorporated into individual projects. Additionally, the permit process serves to minimize impacts by regulating the extent of development adjacent to waters under the jurisdiction requiring the permit. Section 17.16.010 of the Riverside

Grading Code not only requires a NPDES General Permit for construction activity, but also that a Notice of Intent (NOI) be submitted to the State Water Board and that a Storm Water Pollution Prevention Plan (SWPPP) be developed and implemented concurrent with the commencement of any specific grading activities. Also, as a part of this Project, mitigation measure HW-1 on page 5.8-11 of the Final EIR (see Response 15-4) serves to minimize impacts that individual projects may pose.

The comment cites Mockingbird Canyon and Sycamore Canyon as examples of areas that require mitigation for unavoidable and cumulative water impacts. As stated in the excerpt below, the City supports the preservation of publicly owned open spaces and views their function and value as beneficial to the City:

To implement General Plan objectives and policies, the Zoning Code includes zoning districts that apply to large, publicly owned open space areas, such as Sycamore Canyon Park, to ensure preservation of these resources. The City's participation in the Western Riverside County MSHCP will also contribute to the protection of identified critical resource areas within the Planning Area (Final EIR, p. 5.4-26).

As a part of previous developments, the Sycamore Canyon Specific Plan and EIR included requirements for three detention basins for stormwater and water quality control. To date, one of the so-called filtration ponds (northerly marsh) has been constructed and is maintained by the City. This basin is a first-flush detention basin used to filter pollutants in runoff before stormwater is sent to nearby drainages. Two other ponds, the central and southerly marshes, were also planned as part of this project. The City is currently working toward construction of the two remaining filtration ponds and has funds available to do so. Pond completion is dependent upon resolution of Steven's Kangaroo Rat habitat and right-of-way issues. Once these issues are resolved, the City will develop the two remaining filtration ponds.

Response 15-7

The comment recommends that the EIR emphasize that compliance with zoning requirements, specific plan provisions, or other development process aspects does not convey approval to place or remove fill within drainages without prior CWA certification or other appropriate permitting and suggests that the EIR protect the beneficial uses throughout this parkway area. As stated in Section 5.8, Hydrology/Water Quality, on page 5.8-6, the City will achieve water quality objectives through individual developments and by issuance and enforcement of waste discharge permits, such as NPDES permits, for discharges. Effluent limits are the primary mechanisms for controlling discharges of pollutants of waters.

In addition to zoning, permits, and other provisions in place, Section 17.28.020 (Hillside/Arroyo Grading) of the Riverside Grading Code includes regulations that restrict grading in hillside and arroyo areas. The restrictions in this chapter of the Grading Code affect parcels that have a natural slope of ten percent or greater, are zoned Residential Conservation (RC), and are located adjacent to the Mockingbird Canyon, Woodcrest, Prenda, Alessandro, Tequesquite, or Springbrook Arroyos or other significant arroyos in the City. Also, only 25 percent of a pad can be graded or filled without a grading exception,

depending on the sensitivity of the site. Policy OS-5.1, cited on page 5.4-25 of the EIR, encourages the preservation of land within these areas and the RC zoning as follows:

Policy OS-5.1: Preserve significant habitat and environmentally sensitive areas, including hillsides, rock outcroppings, creeks, streams, viewsheds and arroyos through application of the RC zone standards and the Hillside/Arroyo standards of the City's Grading Code.

Also, the Grading Code includes these controls:

- g. Where possible, other arroyos, shall be preserved as natural drainage courses. Significant natural features within these arroyos shall be preserved including riparian vegetation, boulders, rock outcroppings, milling features and deeply incised channels. These features shall be shown on the grading plans submitted for review. To insure that these areas are adequately preserved, an appropriate setback for development and grading may be applied.
- h. Development or grading within blue line streams shall be limited to the minimum necessary for access or drainage structures. Any disturbance will require permits from the U.S. Corps of Engineers and the State Department of Fish and Game. (Ord. 6673 §§ 6, 7, 8, 9, 2003; Ord. 6453 § 1, 1998)

Furthermore, no development within 50 feet of the arroyos named above or their associated tributaries will be permitted, as stated in the Grading Code. The Grading Code also restricts the removal of vegetation within the boundaries of the arroyos and in areas that cannot be graded.

The comment also states that the determinations of all negative declarations for tract maps received in the Overlook Parkway/Alessandro Arroyo area have not included analysis of cumulative environmental impact and suggests that the EIR include a strategy to address this issue comprehensively. The process of approval for NPDES permits is conducted in a regional context, taking into account impacts of the drainage being impacted in a cumulative way, as well as impacts to other drainages having a potential to become impacted. Also, the Overlook Parkway/Alessandro Arroyo area is currently planned or is being developed as low-density residential uses, and the majority of properties in the area have already been developed or have received discretionary approval for future development, with mitigation incorporated into those approvals. As a part of individual project approvals for projects in this area, WQMPs have been developed for each project within the area to prevent or curb cumulative water quality impacts. An additional feature of the area involves the dedication of open space easements outside of graded pads of each subdivided lot. Refer to Response 15-3 for a discussion of WQMP requirements.

Response 15-8

The comment suggests that the EIR be more restrictive on development that proposes subsurface disposal systems for waste, such as septic tanks. Septic tanks are only allowed on lots one acre or larger in size. The County of Riverside's minimum requirement for any subsurface disposal systems is much less restrictive at 0.5-acre lots. Title 18, Subdivisions, of the Riverside Municipal Code states the following:

Section 18.28.090 Sanitary sewers. Sanitary sewers shall be provided to the specifications of the Public Works Department for all land divisions of residential property unless all lots or parcels in the division are one acre net or larger and septic tanks, as approved by the City and the Santa Ana Regional Water Quality Control Board pursuant to the applicable policies and regulations of each entity, are allowed as a condition of approval of the land division. (Ord. 5018 § 11, 1982)

Even though the City allows septic tank systems in accordance with restrictive size requirements, the majority of new development utilizes the connections available from existing sewer systems. Subsurface disposal systems will not be developed on lots smaller than one acre.

Response 15-9

The comment requests that BMPs be deployed around spoil sites at all times. Although not a direct comment regarding the analysis in the EIR, this comment is addressed below.

The Project does not involve any development activity. The Project is the adoption and implementation of the updated General Plan, Zoning Code, Subdivision Code, Citywide Design Guidelines and Magnolia Avenue Specific Plan. These documents will be used to guide future development and growth in the Riverside Planning Area and do not propose specific development projects. Individual development projects that may involve waste discharged into drainage areas, channels, streambeds, or streams will require implementation of BMPs at the specific project site. With implementation of Mitigation Measure HW-1 on page 5.8-11 of the Final EIR and all applicable standard conditions of approval, the impacts to surface drainage will be less than significant at the programmatic level.

Response 15-10

The comment recommends that the EIR include development and construction project guidelines designed to protect and improve the quality of groundwater basins. Policies such as OS-10.8, OS-10.9, OS-10.10 and OS-10.11 protect the quality and quantity of groundwater in the Planning Area. In addition to implementation of the above General Plan policies, any future project within the Planning Area that may increase the amount of impervious surfaces must be analyzed on an individual basis in accordance with the City's standard CEQA, CWA 401 water quality standards certification, and project review processes.

Wetlands not only provide habitat value for a wide variety of plants and animals, but can also act as natural filters that enhance water quality. As stated in the Open Space and Conservation Element (page OS-39), the Hidden Valley Wetlands Enhancement Project is an example of the use of natural vegetation filtering excess nutrients in water. The wetlands in Hidden Valley are utilized as a part of the wastewater treatment process through its nitrogen management. Treated wastewater entering the wetlands is closely monitored, and effective barriers are in place to minimize harm to the wetlands. The City considers the water filtration value that wetlands and other types of native vegetation provide as an asset worth protecting.

Response 15-11

The comment states that native vegetation should be preserved and protected, and clearing of vegetation should be strictly limited. The comment also encourages the use of replanting and hydroseeding of native vegetation. Policies such as Policy OS-10.4 promote the use of native, low-water use and drought-tolerant plant species for park and private development (page 5.8-9 of the Final EIR). Additionally, Policies OS-5.1 and OS-5.4 supports the preservation and protection of native habitat, significant habitat, and habitat in environmentally sensitive areas.

Response 15-12

The comment suggests that a policy of considering wildlife corridors should be supported by measures that require mitigation for construction impacts to natural drainage and other surface waters. On page 5.4-26 of the Final EIR, implementation of Objective OS-6 preserves and maintains wildlife movement corridors in the Planning Area. Policies OS-6.1, OS-6.2, OS-6.3, and OS-6.4 also support known wildlife migratory corridors and the creation of new open space linkages. Policy OS-1.5 requires the provision of opens space linkages between development projects consistent with the Trails Master Plan, Open Space Plan, and other environmental considerations including the Multi-Species Habitat Conservation Plan (MSHCP) for Riverside County.

Refer to Response 15-12 for a discussion of the preservation of natural drainage systems such as wetlands.

LETTER 16

STATE OF CALIFORNIA
Governor

Arnold Schwarzenegger

NATIVE AMERICAN HERITAGE COMMISSION

915 CAPITOL MALL, ROOM 364
SACRAMENTO, CA 95814
(916) 653-4082
(916) 657-5390 - Fax

January 3, 2005

Mr. Craig Aaron
Riverside Planning Dept.
3900 Main St., 3rd Floor
Riverside, CA 92522Clear
1-3-05
lateRe: DEIR; City of Riverside General Plan, Zoning Code, Subdivision Code, Citywide Design Guidelines
and Magnolia Avenue Specific Plan
SCH# 2004021108

Dear Mr. Aaron:

Thank you for the opportunity to comment on the above-mentioned document. The Commission was able to perform a record search of its Sacred Lands File for the project area, which failed to indicate the presence of Native American cultural resources in the immediate project area. The absence of specific site information in the Sacred Lands File does not indicate the absence of cultural resources in any project area. Other sources of cultural resources should also be contacted for information regarding known and recorded sites.

16-1

Early consultation with tribes in your area is the best way to avoid unanticipated discoveries once a project is underway. Enclosed is a list of Native Americans individuals/organizations that may have knowledge of cultural resources in the project area. The Commission makes no recommendation of a single individual or group over another. Please contact all those listed; if they cannot supply you with specific information, they may be able to recommend others with specific knowledge. By contacting all those listed, your organization will be better able to respond to claims of failure to consult with the appropriate tribe or group. If you have not received a response within two weeks' time, we recommend that you follow-up with a telephone call to make sure that the information was received.

16-2

Lack of surface evidence of archeological resources does not preclude the existence of archeological resources. Lead agencies should consider avoidance, as defined in Section 15370 of the CEQA Guidelines, when significant cultural resources could be affected by a project. Provisions should also be included for accidentally discovered archeological resources during construction per California Environmental Quality Act (CEQA), Public Resources Code §15064.5 (f). Health and Safety Code §7050.5; and Public Resources Code §5097.98 mandate the process to be followed in the event of an accidental discovery of any human remains in a location other than a dedicated cemetery and should be included in all environmental documents. If you have any questions, please contact me at (916) 653-6251.

16-3

Sincerely,

Carol Gaubatz
Program Analyst

Cc: State Clearinghouse



Arnold
Schwarzenegger
Governor

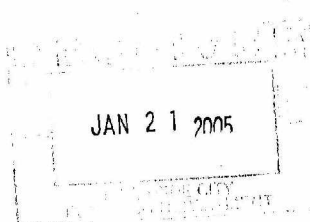
STATE OF CALIFORNIA
Governor's Office of Planning and Research
State Clearinghouse and Planning Unit



Jan Boel
Acting Director

January 19, 2005

Craig Aaron
City of Riverside Planning Department
3900 Main Street, 3rd Floor
Riverside, CA 92522



Subject: City of Riverside General Plan, Zoning Code, Subdivision Code, Citywide Design Guidelines and
Magnolia Avenue Specific Plan
SCH#: 2004021108

Dear Craig Aaron:

The enclosed comment (s) on your Draft EIR was (were) received by the State Clearinghouse after the end of the state review period, which closed on January 3, 2005. We are forwarding these comments to you because they provide information or raise issues that should be addressed in your final environmental document.

The California Environmental Quality Act does not require Lead Agencies to respond to late comments. However, we encourage you to incorporate these additional comments into your final environmental document and to consider them prior to taking final action on the proposed project.

Please contact the State Clearinghouse at (916) 445-0613 if you have any questions concerning the environmental review process. If you have a question regarding the above-named project, please refer to the ten-digit State Clearinghouse number (2004021108) when contacting this office.

Sincerely,

Terry Roberts
Senior Planner, State Clearinghouse

Enclosures

cc: Resources Agency

1400 TENTH STREET P.O. BOX 3044 SACRAMENTO, CALIFORNIA 95812-3044
TEL (916) 445-0613 FAX (916) 323-3018 www.opr.ca.gov

16. Carol Gaubatz, Program Analyst, Native American Heritage Commission, State of California. January 3, 2005 (Received January 18, 2005).

Response 16-1

The comment states that a record search of the Native American Heritage Commission (NAHC) conducted for the Project failed to indicate the presence of Native American cultural resources for the Planning Area and that the absence of records does not indicate the absence of cultural resources in the Planning Area. The significance of impacts to Native American cultural resources resulting from specific future development projects will be determined on a project-by-project basis. If project-level impacts are identified, specific mitigation measures will be required per California Environmental Quality Act (CEQA).

As part of the General Plan program, the City prepared a cultural resource sensitivity map, based on research conducted by Applied Earthworks. Due to the sensitivity of such information and the need to protect potential resources, the map is not included in the General Plan or EIR (see discussion below). However, City staff will use the map and associated report in the review of development applications and to determine when detailed cultural resource assessments should be required.

Response 16-2

The comment suggests that the City contact all Native American individuals and organizations that have knowledge of cultural resources in the Planning Area to avoid unanticipated discoveries once a project is underway. As stated on page 5.5-14 of the Final EIR, a literature and records search for prehistoric and historical archaeological resources of the general project location was completed by Applied Earthworks archaeologists at the Eastern Information Center (EIC) of the California Historical Resources Information System between July 16 and July 21, 2003. Data gathered included plotting the locations of all previously identified archaeological sites, a listing of all manuscript files pertaining to cultural resources studies, and estimations regarding previous archaeological survey coverage per square mile.

Results of the archaeological literature and records search at the EIC indicate that more than 310 cultural resources investigations have been completed within the City's Planning Area. These cultural resources studies resulted in the identification and documentation of more than 800 prehistoric and historical archaeological sites. Within current City limits, 538 prehistoric sites, 51 historical sites and 5 sites containing both prehistoric and historical remains have been documented; within the City's Sphere of Influence an additional 199 prehistoric sites, 8 historical sites, and one site containing both prehistoric and historical remains have been documented. The details of this comprehensive search are located in Appendix D of the Project. Also, the significance of impacts to potentially unanticipated discoveries resulting from specific future development projects will be determined on a project-by-project basis. If project-level impacts are identified, specific mitigation measures will be required per CEQA.

Response 16-3

The comment recommends that the City include provisions in the Project for accidentally discovered archeological resources found during construction per CEQA and states that the Health and Safety Code and Public Resources Code shall mandate the process to be followed in the event of an accidental discovery. As stated in page 5.5-17 of the Final EIR, the City will continue to incorporate as conditions of approval of any development project's approval that the discovery of remains or any other discovered archeological resource during construction will require a temporary cessation of work until the discovery is assessed by a qualified professional. Also, Policy 1.3, in the General Plan and on page 5.5-16 of the Final EIR, indicates that the City will protect sites of known archeological and paleontological significance and will ensure compliance with the federal Native American Graves Protection and Repatriation Act during the project's planning review process. Additionally, the significance of impacts to cultural and paleontological resources resulting from specific future development projects will be determined on a project-by-project basis. If project-level impacts are identified, specific mitigation measures will be required per CEQA.

APPENDIX A – Program Draft EIR Mailing List

Responses to Comments

Alamo Water District
4432 Strong Street
Riverside, CA 92501

Alvord Unfd School Dist
Attn: Sheryl Calhoun
10365 Keller Avenue
Riverside, CA 92505

BNSF
Bob Grimes
740 East Carnegie Drive
San Bernardino, CA 92408

California Baptist University
8432 Magnolia Avenue
Riverside, CA 92504

Dennis J. O'Bryant
California Department of Conservation
801 K Street, MS 24-01
Sacramento, CA 95814

Caltrans, District 8
464 West 4th Street, 7th Floor
San Bernardino, CA 92401-1400

Charter Communications
Attn: Erwin Tando
7337 Central Avenue
Riverside, CA 92504

City of Colton
650 North La Cadena Drive
Colton, CA 92324-2893

City of Corona
Terri Manuel, AICP
Planning Department
815 West Sixth Street
Corona, CA 92882-3238

City of Grand Terrace
22795 Barton Road
Grand Terrace, CA 92324

City of Moreno Valley
Planning Dept.
14177 Frederick Street
Moreno Valley, CA 92553

City of Norco
P. O. Box 428
Norco, CA 91760

City of Riverside Public Library
Eastside Cybrary
4016 Chicago Avenue
Riverside, CA 92507

City of Riverside Public Library
La Sierra Branch
4600 La Sierra Avenue
Riverside, CA 92505

City of Riverside Public Library
Nichols Cybrary Center
5505 Dewey Street
Riverside, CA, 92504

City of Riverside Public Library
Main Library
3581 Mission Inn Ave.
Riverside, CA 92501

City of Riverside Public Library
Arlington Neighborhood Library
9556 Magnolia Ave.
Riverside, CA 92503

City of Riverside Public Library
Casa Blanca Family Learning Center
2985 Madison Street
Riverside, CA 92504

City of Riverside Public Library
Marcy Neighborhood Branch
3711 Central Avenue
Riverside, CA 92506

Director of Office Of
Planning & Design Construction
UCR
Riverside, CA 92521

Eastern Muni Water Dist
P. O. Box 8300
Perris, CA 92572-8300

Edgemont Community
Services District
P. O. Box 2024
Riverside, CA 92516

FAA -Western Pacific Region
15000 Aviation Boulevard
Lawndale, CA 90261

Gage Canal
Attn: John M. Hocking
7452 Dufferin Avenue
Riverside, CA 92504

Gas Company
Mike Edson
251-A E First Street
Beaumont, CA 92223-2903

General Telephone
Company of California
P. O. Box 920
Pomona, CA 91769-2920

Governor's Office of Emergency Services
11030 White Rock Rd., Suite 110
Rancho Cordova, CA 95670

Kinder Morgan Pipe Line
Tim Buchoz
2359 S. Riverside Avenue
Bloomington, CA 92316

La Sierra University
4700 Pierce Street
Riverside, CA 92515

Riverside LAFCO
3850 Vine Street, Suite 110
Riverside, CA 92507-4277

MARB
452 SPTG/CEV
March ARB, CA 92518-2166

MARB U.S. Air Force
Base Operations
March AFB
Riverside, CA 92508

March JPA
% Dan Fairbanks
P.O. Box 7480
Moreno Valley CA 92552

Responses to Comments

Metropolitan Water Dist
Laura J. Simonek
Environmental Planning Team
Po Box 54153
Los Angeles, CA 90054-0153

Office of Planning & Research
1400 Tenth Street, P.O. Box 3044
Sacramento, CA 95812-3044

Perris Union High School District
155 East 4th Street
Perris, CA 92570

Richard Marston
Paragon Partners Ltd.
5762 Bolsa Avenue, Suite 201
Huntington Beach, CA 92649

Riverside County
Parks Department
4600 Crestmore Road
Riverside, CA 92509

Riverside County Fire Department
Deputy Chief Mike Brown
210 West San Jacinto Avenue
Perris, CA 92570

Riverside County Waste Management
District
Mirtha Liedl, Planner
14310 Frederick Street
Moreno Valley, CA 92553

San Bernardino County
Land Use Services Department
385 North Arrowhead Avenue, 1st Floor
San Bernardino, CA 92415-0182

So. Cal. Association of Governments
Jeffrey M. Smith, AICP,
Intergovernmental Review, 818 W.
Seventh Street, 12th Floor (Main Office)
Los Angeles, CA 90017-3435

Southern Calif. Gas Co.
Ronald Dietl,
9400 Oakdale Av ML 9314
Chatsworth, CA 91313-6511

Southern/Union Pacific Transportation
Freddie Cheung
19100 Slover Avenue
Bloomington, CA 92316

Moreno Valley Unified
Dr. John Costello
13911 Perris Boulevard
Moreno Valley, CA 92553

Pacific Bell
Maryann Cassaday 1st Flr
3939 E Coronado St
Anaheim, CA 92807

RCTC
P. O. Box 12008
Riverside, CA 92502-2208

Riverside Community College
4800 Magnolia Avenue
Riverside, CA 92506

Riverside County
Transportation, 8th Flr
P.O. Box 1090
Riverside, CA 92502

Riverside County Flood
Control District
1995 Market Street
Riverside, CA 92501

Riverside Transit Agency
1825 Third Street
Riverside, CA 92517
Attn: Anne Palatino

Santa Ana Watershed Project Authority
Michelle Campbell/Peter Vitt
11615 Sterling Avenue
Riverside, CA 92503

South Coast Air Quality Mngt. District
Steve Smith, Ph.D.
21865 E Copely Dr.
Diamond Bar, CA 91765-4182

Southern Calif. Gas Co.
Gertman Thomas
P. O. Box 3003
Redlands, CA 92373

State Mining & Geology Board
801 K Street, Suite 2015
Sacramento, CA 95814

Northwest Mosquito &
Vector Control Dist
1966 Compton Av
Corona, CA 91719

Pacific Bell
Right-of-way
1265 Van Buren Street
Anaheim, CA 92807

Regional Water Quality Control Board
3737 Main Street, Suite 500
Riverside, CA 92501-3348

Riverside/Corona Conservation Resource
District
Shelli Lamb
4500 Glenwood Drive
Riverside, CA 92501

Riverside County
Planning Dept., Robert Johnson
P.O. Box 1469
Riverside, CA 92502

Riverside County Sheriffs Department
Sheriff Bob Doyle
4095 Lemon Street
Riverside, CA 92501

Rvrsd Unfd School Dist
Attn: Janet Dixon
3070 Washington Street
Riverside, CA 92504

SBC-Pacific Bell
Premis-S L I C
1452 Edinger Avenue, Room 1200
Tustin, CA 92780

Southern Calif. Edison
Eastern Division
P. O. Box 788
Rialto, CA 92376

Southern California Regional Rail
Authority
700 South Flower Street, 26th Floor
Los Angeles CA 90017-4101

State of California
Geological Survey
801 K Street, MS 12-30
Sacramento, CA 95814

Responses to Comments

State Resources Agency
1416 Ninth Street, Suite 1311
Sacramento, CA 95814

U.S. Army Corp of Engineers LA District
915 Wilshire Blvd., Suite 980
Los Angeles, CA 90017

U.S. Dept. of Transportation
Federal Railroad Administration
1120 Vermont Avenue NW
Washington, DC 20590

U.S.F.W.S
6010 Hidden Valley Road
Carlsbad, CA 92009

Val Verde School District
2935 Indian Street
Perris, CA 92370

Western Muni. Water Dist
P. O. Box 5286
Riverside, CA 92517

WRCOG
4080 Lemon Street,
Riverside CA 92501

Keith D. Downs, AICP AAEE, Executive
Director, Airport Land Use Commission
5555 Arlington Avenue
Riverside, CA 92504-2506

Leo Doiron, Airport Manager
Flabob Airport
4130 Mennes Avenue
Riverside, CA 92509

Southern California Edison
Planning Department
287 Tennessee Street
Redlands, CA 92373

Corona Resources Conservation District
Shelli Lamb
4500 Glenwood Drive
Riverside, CA 92501

Arlee Montalvo
RCRCD
Dept. Of Botany and Plant Sciences
UCR
Riverside, CA 92521

Press Enterprise
Doug Haberman
3512 14th Street
Riverside. CA 92507

California Department of Conservation
801 K Street, 24th Floor
Sacramento, CA 95814

California Dept of Fish and Game
Habitat Conservation
4949 Viewridge Avenue
San Diego, CA 92123

California Office of Historic Preservation
PO Box 942896
Sacramento, CA 95814

California Department of Parks &
Recreation, 1416 9th Street
P.O. Box 942896
Sacramento, CA 94296-0001

California Reclamation Board
1416 9th Street, Room 1601
Sacramento, CA 95814

State Dept of Water Resources
1416 9th Street, 3rd Floor
Sacramento, CA 95814

Caltrans
Division of Aeronautics-MS 40
PO Box 942874
Sacramento, CA 94274-0001

Caltrans Planning
PO Box 942874
Sacramento, CA 94274-0001

Department of Housing & Community
Development, Housing Policy Division
1800 Third Street, Room 430
Sacramento, CA 95814

California Air Resources Board
1001 "I" Street
Sacramento, CA 95814-2814

California Integrated Waste Management
Board
1001 I Street
Sacramento, CA 95814

State Water Resources Control Board,
Division of Clean Water Program
1001 I Street
PO Box 100
Sacramento, CA 95812-4025

Santa Ana Region
State Water Quality Control Board
3737 Main Street, Suite 500
Riverside, CA 92501-3339

California Energy Commission
1516 Ninth Street, MS-15
Sacramento, CA 95814

California Native American Heritage
Commission, Executive Secretary
915 Capitol Mall, Room 364
Sacramento, California 95814

California Public Utilities Commission
San Francisco Headquarters
505 Van Ness Avenue
San Francisco, CA 94102

California Public Utilities Commission
San LA Office
320 West 4th Street, Suite 500
Los Angeles, CA 90013

California State Lands Commission
100 Howe Avenue, Suite 100 South
Sacramento, CA 95825-8202

State Water Resources Control Board
Division of Water Quality
PO Box 944213
Sacramento, CA 94244-2130

State Water Resources Control Board
Division of Water Rights
PO Box 944212
Sacramento, CA 95814-2120

Dept. Of Toxic Substances Control
CEQA Tracking Center
400 P Street, Fourth Floor
PO Box 806 (1001 I St)
Sacramento CA 95812-0806

APPENDIX B – Petition Included with Letter #9

The following parents of Sierra Middle School students oppose the designation of Central Avenue between Brockton Avenue and the Riverside Municipal Airport as an Arterial. For the health and safety of our children, we do not want diesel trucks using the street in front of their school to travel between Highway 91 and Van Buren Blvd.

Your Signature	Please print your name
	Melissa Pollock
	Linda Rodriguez
	Kimberly Foreman
	Patrick Benn
	Olivia Llanes
	Yolanda Melara
	LISA PRATT
	MARK PRATT
	DAVID BIELMAN
	Janice Bielman
	JANET PIERCEALL
	KATHY NISSAR
	Luis Lopez Lopez
	Debra Van Billiard
	KENNETH VAN BILLESTED
	SUSAN TODD
	TONIA REED
	Lynda Alfstad
	Cherylinda Barnard
	Andrew Valenzuela

Responses to Comments

The following parents of Sierra Middle School students oppose the designation of Central Avenue between Brockton Avenue and the Riverside Municipal Airport as an Arterial. For the health and safety of our children, we do not want diesel trucks using the street in front of their school to travel between Highway 91 and Van Buren Blvd.

Your Signature	Please print your name
	Johnny Rodriguez
	Sandra Harper
	Lydia Lerma
	Marcela Herrera
	Margarito Quintanar
	Brandie Sowder
	Luis Lopez Lopez
	Sherri Alldis
	SHARBIR KAZI
	AAMIR KAZI
	LAMINI WHEELER
	Luis Sahaqui
	LAURA PREEVES
	RICARDO CISNEROS
	Gabriela Cisneros
	ERICKA MARTINEZ
	Kaitelle Carroll
	Donna Cabrera
	Jaume Saez
	Glenda L. Conley Aldrich

The following parents of Sierra Middle School students oppose the designation of Central Avenue between Brockton Avenue and the Riverside Municipal Airport as an Arterial. For the health and safety of our children, we do not want diesel trucks using the street in front of their school to travel between Highway 91 and Van Buren Blvd.

Your Signature	Please print your name
<i>Sylvia Garcia</i>	Sylvia Garcia - Giovanni Solano
<i>Sylvia Garcia</i>	Sylvia Garcia Michael Solano
<i>Lynne Massery</i>	Lynne Massery
<i>Joseph L Perry</i>	Joseph L Perry
<i>Juanita M. Perry</i>	Juanita M. Perry
<i>William Perry</i>	William Perry
<i>Mary Winton</i>	MARY WINTON
<i>Elaine Lopez</i>	Pelly Rodriguez
<i>Annette Cruz</i>	Annette Cruz
<i>Ter Brawley</i>	Ter Brawley
<i>Esther Martinez</i>	Esther Martinez
<i>Teresa Mendez</i>	Teresa Mendez
<i>Rudy Howell</i>	Rudy Howell
<i>Elenora Howell</i>	Elenora Howell
<i>Tamara Bragdon</i>	Tamara Bragdon
<i>Monica Lancaster</i>	Monica Lancaster
<i>Carmen Segura</i>	Carmen Segura
<i>Margy Crowley</i>	Margy Crowley
<i>David Crowley</i>	DAVID CROWLEY

Responses to Comments

- The following parents of Sierra Middle School students oppose the designation of Central Avenue between Brockton Avenue and the Riverside Municipal Airport as an Arterial.
- For the health and safety of our children, we do not want diesel trucks using the street in front of their school to travel between Highway 91 and Van Buren Blvd.

Your Signature	Please print your name
<i>Cheryl Valenzuela</i>	Cheryl Valenzuela
<i>Julianna M. Cruz</i>	Julianna M. Cruz
<i>Connie J. Anderson</i>	Connie J. Anderson
<i>Darlene Denning</i>	Darlene Denning
<i>Mrs. A. Alcantar</i>	Mrs. A. Alcantar
<i>Aaron Sims</i>	Aaron Sims
<i>Jonathan Lanier</i>	Jonathan Lanier
<i>Deborah Lanier</i>	Deborah Lanier
<i>Theresa Romero</i>	Theresa Romero
<i>Margaret Quintana</i>	Margaret Quintana
<i>Juan Villanor (Ambriz)</i>	JUAN VILLANOR (Ambriz)
<i>Ana Maria Munguia</i>	Ana Maria Munguia
<i>Tammy Landry</i>	Tammy Landry
<i>Charles Clinton</i>	CHARLES CLINTON
<i>Brenda K. Clinton</i>	Brenda Clinton
<i>Christine Navarro</i>	CHRISTINE NAVARRO
<i>Laura Lopez</i>	Laura Lopez
<i>Arri Garcia-Ortega</i>	Arri Garcia-Ortega
<i>Stella Ochoa</i>	STELLA OCHOA
<i>Martin Aguilar Sr.</i>	MARTIN AGUILAR SR.

The following parents of Sierra Middle School students oppose the designation of Central Avenue between Brockton Avenue and the Riverside Municipal Airport as an Arterial. For the health and safety of our children, we do not want diesel trucks using the street in front of their school to travel between Highway 91 and Van Buren Blvd.

Your Signature	Please print your name
<u>Brandie Sowder</u>	Brandie Sowder
<u>L. Victorio</u>	Lourdes Victorio
<u>Veronica Guiza</u>	Veronica Guiza
<u>Evelyn Ranson</u>	Evelyn Ranson
<u>Joey L Hernandez</u>	Joey L. Hernandez
<u>Charlene Negrete</u>	Charlene Negrete
<u>TEPPI CONNER</u>	TEPPI CONNER
<u>MIKE BUSCHMAN</u>	MIKE BUSCHMAN
<u>THERESA Padilla</u>	THERESA Padilla
<u>Theresa Lamboy</u>	Theresa Lamboy
<u>Dannu Conner</u>	Dannu Conner
<u>JOHN T. STOKAS</u>	JOHN T. STOKAS
<u>Tennifer Raymond</u>	Tennifer Raymond
<u>Consuelo Guerrero</u>	Consuelo Guerrero
<u>CAROLIN Dauphine</u>	CAROLIN Dauphine
<u>Sherral Crump</u>	Sherral Crump
<u>Joseph W. Reeves</u>	Joseph W. Reeves
<u>DANIEL DISTROCA</u>	DANIEL DISTROCA
<u>Carla Distola</u>	Carla Distola

Responses to Comments

- The following parents of Sierra Middle School students oppose the designation of Central Avenue between Brockton Avenue and the Riverside Municipal Airport as an Arterial.
- For the health and safety of our children, we do not want diesel trucks using the street in front of their school to travel between Highway 91 and Van Buren Blvd.

Your Signature	Please print your name
	Carlos Almor
	Sonya Dobbs
	Thomas E. Ruby
	Kristen Huggins
	Collene Ballenger
	Robert Murillo
	Yolanda Calderon
	Derek/Monica Ellison
	Kenee Green
	Samantha Nichols
	Warda Hanna
	Lisa Sanchez
	Yvonne Torres
	Kim Gonzalez
	Jeff Lasater
	Dennis Bechen
	Shelley Kallenda
	Raquel Marion
	JENNIFER (BUSCHMAN)
	Valerie Janik

The following parents Sierra Middle School students oppose the designation Central Avenue between Brockton Avenue and the Riverside Municipal Airport as Arterial. For the health and safety of our children we do not want diesel trucks using the street in front of their school to travel between Highway 91 and Van Buren Blvd

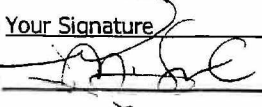
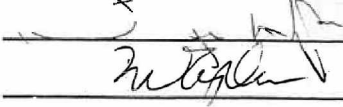
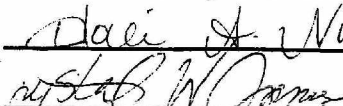
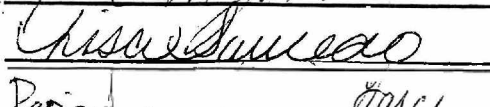
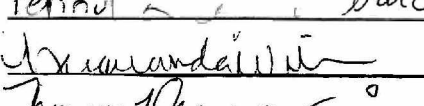

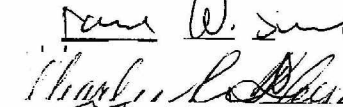
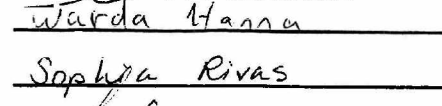
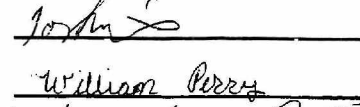
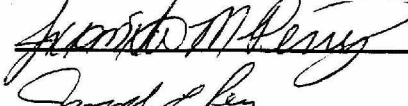
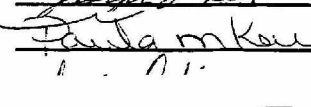

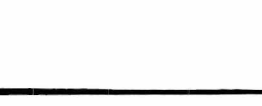



Your Signature

Please print your name

Sandie Smith	SANDIE Smith
Gary Vadder	GARY VEDDER ☺
Peggy A Gomez	Peggy A Gomez
Vicior J. Gomez	VICIOR J GOMEZ
Karen Hardy	Karen Hardy
Patricia Lantieri	Patricia Lantieri
Marvia Acken	Marvia Acken
Jose Alvarado	Jose Alvarado
SCOTT	Scott Tabor
Jennifer Cruz	Jennifer Cruz
Enriqueta Maya	Enriqueta Maya
Hector Maya	Hector MAYA
Maria Sanchez	Maria Sanchez
LUNNA Douglas	LUNNA Douglas
Bethnales	Bethnales
Jackie Madison	Jackie Madison
Isencia Arguilla	Isencia Arguilla
Edith Stevens	Edith Stevens
Debra Alfaro	Debra Alfaro
Suzanne P Shumway	Suzanne P Shumway

Responses to Comments

The following parents of Sierra Middle School students oppose the designation of Central Avenue between Brockton Avenue and the Riverside Municipal Airport as an Arterial. For the health and safety of our children, we do not want diesel trucks using the street in front of their school to travel between Highway 91 and Van Buren Blvd.

Your Signature	Please print your name
	Michelle Smith
	Darl L Hooper
	Paula Waples
	Hollie Vuchel
	Lisa Saucedo
Period 2 Daci	Sylvia Garcia - Bonnie
	LUGUANDA Williams
	Thomas N. Deenry
	Kathy Chennault
	Louis W. Serrv
	Charles R. Floyd
	Warda Hanna
Sophia Rivas	Sophia Rivas
John S	John Smith
William Perry	William Perry
	Juanita Perry
	Tor Perry
	Paula M. Kowry
	John F. Kowry
	Mike Phelps

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Signature	Please print your name
	Carrie Graham - Amy
Richard Larson	Richard Larson
NORMA HERNANDEZ	NORMA HERNANDEZ
Cecilia Easley	Cecilia Easley
Theresa Ellis	Theresa Ellis
Holli Nichols	Holli Nichols
Crystal W. Jones	Crystal W. Jones
Susan Samson	Susan Samson
Erin Young	Erin Young
Norma Carrillo	Norma Carrillo
Rob Ambert	Rob Ambert
Laura K. Stoyas	Laura K. Stoyas. Kristie
Anadeicy F...	Anadeicy F...
Victor C...	Victor C...
Elvia Rodriguez	Elvia Rodriguez
Dan Nichols	Dan Nichols
Elizabeth...	Elizabeth...
Thomas Glen...	Thomas Glen...
Steve Soudler	Steve Soudler

Responses to Comments

The following parents of Sierra Middle School students oppose the designation of Central Avenue between Brockton Avenue and the Riverside Municipal Airport as an Arterial. For the health and safety of our children, we do not want diesel trucks using the street in front of their school to travel between Highway 91 and Van Buren Blvd.

Your Signature	Please print your name
	Betty Ambajal
	Elizabeth Larson
	GABRIELA ARROYO
	Sherrie Williams
	ROBERTA FOLDA (JOSE PEREZ NANA)
	Ceista Perez JOSE PEREZ
	MARK SCIBUSH
	Laurie Ludwig
	Jeff Ludwig
	IRMA DE LA TORRE
	David Schneck
	Rosa E. Carcamo
	CAROL MCCALL
	Emma Pfingst
	Andrea J. Pfingst
	Sandra Salas
	ELIA VEGA
	JOSE D. CHAVEZ
	Carmen Suarez

The following parents of Sierra Middle School students oppose the designation of Central Avenue between Brockton Avenue and the Riverside Municipal Airport as an Arterial. For the health and safety of our children, we do not want diesel trucks using the street in front of their school to travel between Highway 91 and Van Buren Blvd.

Your Signature	Please print your name
	Danielle Caldeon
	Chi Duong
	Rosa Ramirez
	MARK R OGAWA
	Kimberly Rodriguez
	Sandra Lopez
	Sharon Keri
	Joseph Rodriguez
	Veronica Glenn
	Lloyd E. Ridenour Jr
	ISABEL C RIDENOUR
	Lisa Holcomb
	Stella Thompson
	Valerie Thompson
	Ruth Stamatikos
	TOMMY STAMATIKOS
	Robert Mayberry
	Gigi McDonald
	R.J. McDonald

Responses to Comments

The following parents of Sierra Middle School students oppose the designation of Central Avenue between Brockton Avenue and the Riverside Municipal Airport as an Arterial. For the health and safety of our children, we do not want diesel trucks using the street in front of their school to travel between Highway 91 and Van Buren Blvd.


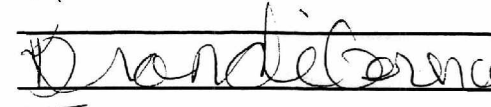



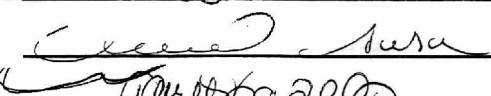
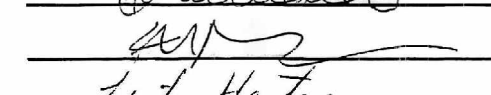
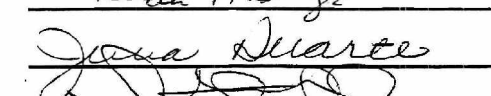
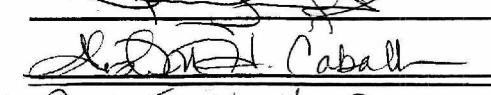
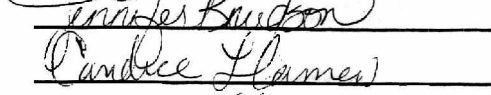







Your Signature	Please print your name
Ana M. Melgoza	Ana M. Melgoza
Denise Basore	Denise Basore
Donne Basore	Duane Basore
Mildred Ortega	Mildred Ortega
Felix Ortega	Felix Ortega
Dave Gladura	Dave Gladura
Nancy Gladura	Nancy Gladura
Julie Martin	JULIE MARTIN
Janet Mendoza	JANET MENDOZA
Freddie H. Mendoza	Freddie H. Mendoza
Debbie Quisenberry	DEBBIE QUESENBERY
Marco Bardales	MARCO BARDALES
Shabbir Kazi	SHABBIR KAZI
Alan Ara Kazi	ALAN ARA KAZI
Janine Papavero	JANINE PAPAVERO
Mark A. Moss	Mark A. Moss
Nick Sosa	NICK SOSA
Raquel Macias	Raquel Macias
Lavinia Perez	Lavinia Perez

The following parents of Sierra Middle School students oppose the designation of Central Avenue between Brockton Avenue and the Riverside Municipal Airport as an Arterial, or the health and safety of our children, we do not want diesel trucks using the street in front of their school to travel between Highway 91 and Van Buren Blvd.

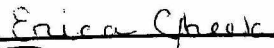
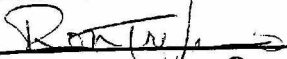

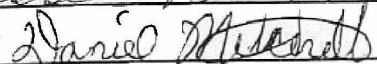
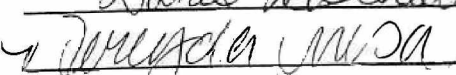
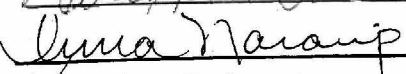

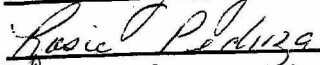
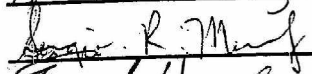
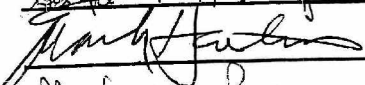
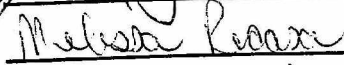
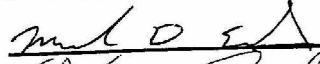

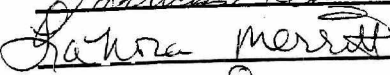
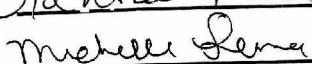
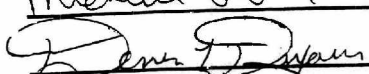

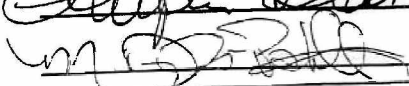
our Signature	Please print your name
	LYDIA HERNANDEZ
	Ashton Carroll
	Elizabeth Carlson
	Sandra S. Soares
THOMAS AUSTIN	THOMAS AUSTIN
Valerie Lopez	Valerie Lopez
	-
	Aaron Tyre Evelyn Abdulhameed
	LARRY BLANCHETTE
MARIA C. BLANCHETTE	MARIA C. BLANCHETTE
Les Hargen	Les Hargen
Rosa Elena Pimentel	ROSA E. PIMENTEL
Wesley Dan Purkiss	
Mark and Patricia Brown	Patricia Brown
Gloria Lema	Gloria Lema
	HAROLD S. EDDY
	Francisco J. Pelarde
	Linda J. Scortino
	Vicki Johnson
	SAMANTHA MEYERS

Responses to Comments

- The following parents of Sierra Middle School students oppose the designation of Central Avenue between Brockton Avenue and the Riverside Municipal Airport as an Arterial.
For the health and safety of our children, we do not want diesel trucks using the street in front of their school to travel between Highway 91 and Van Buren Blvd.

Your Signature	Please print your name
	Patti Brown
	Brandi Gerhardt
	Trisha Brown
	Georgina Andrade
	Sandra O'Cop
	John D. O'Cop
	Debra DeFolice
	Rich Soza
	JANEL S. PADILLA-CHAVEZ
	Marie Rivera
	LINDA HASTINGS
	Julia Duarte
	Falsio Duarte
	Alena Caballero
	Jennifer Knudson
	Candice Uamas
	MANUEL OLIVARES

The following parents of Sierra Middle School students oppose the designation of Central Avenue between Brockton Avenue and the Riverside Municipal Airport as an Arterial. For the health and safety of our children, we do not want diesel trucks using the street in front of their school to travel between Highway 91 and Van Buren Blvd.

Your Signature	Please print your name
	Erica Cheek
	Ron T. [unclear]
	Lorraine Purkiss
	Daniel Mitchell
	NEREYDA MESA
	Irma Naranjo
	Leslie Raybon
	ROSIE PEDROZA
	Sergio R. Mendez
	MARK HAWKINS
	MILFRICASTA
	Michael D. Elkins
	Patricia Fields
	Sherice Williams
	Michelle Lerma
	Denis L. Dufour
	Phyllis Dean
	Melissa Naranjo

Responses to Comments

The following parents of Sierra Middle School students oppose the designation of Central Avenue between Brockton Avenue and the Riverside Municipal Airport as an Arterial. For the health and safety of our children, we do not want diesel trucks using the street in front of their school to travel between Highway 91 and Van Buren Blvd.

Your Signature

Please print your name

Erica Cheek	Erica Cheek
Ron Trujillo	Ron Trujillo
Lorraine Purkiss	Lorraine Purkiss
Daniel Mitchell	Daniel Mitchell
NEREYDA MESA	NEREYDA MESA
Irma Naranjo	Irma Naranjo
Leslie J. Raybon	Leslie Raybon
Rosie Pedroza	ROSIE PEDROZA
Sergio R. Mendez	Sergio R. Mendez
MARK HAWKINS	MARK HAWKINS
MILFBRICIST	MILFBRICIST
Michael D. Elkins	Michael D. Elkins
Tatricia Fields	Tatricia Fields
Sherice Williams	Sherice Williams
Michelle Lerma	Michelle Lerma
Denis L. Dufour	Denis L. Dufour
Phyllis Dean	Phyllis Dean
Melissa Naranjo	Melissa Naranjo

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Your Signature	Please print your name
	Virginia L Luby
	Thomas E Luby
	Charles Rios
	James Martin
	Janelle Coddling
	MARK Coddling
	Jessica Coddling
	Dominique M.
	Chelly Hart
	Beth Gle
	Tracie Bell
	Virginia Jarulillo.
	Kim Namian
	Michael W Darling
	Deborah L Darling
	APRIL Cain
	EMILIO AGUILAR
	Tom Conacher No on A

Responses to Comments

The following parents of Sierra Middle School students oppose the designation of Central Avenue between Brockton Avenue and the Riverside Municipal Airport as an Arterial. For the health and safety of our children, we do not want diesel trucks using the street in front of their school to travel between Highway 91 and Van Buren Blvd.

Your Signature	Please print your name
	Linda C Zarate
	Dorothy Howard
	Juan Torres
	ELLA FAULK
	MARIA GUTIERREZ
	JOHN ALFRED
	Debra Bassett
	Sylvia Mars
	Gretchen McCroskey
	LUCIA CASTILLO
	Becky Murillo
	Robert Murillo
	Luis Corona
	Lydia Lerma

The following parents of Sierra Middle School students oppose the designation of Central Avenue between Brockton Avenue and the Riverside Municipal Airport as an Arterial. For the health and safety of our children, we do not want diesel trucks using the street in front of their school to travel between Highway 91 and Van Buren Blvd.

Your Signature Jerry & Renee Oporto Jerry & Renee ^{Oporto}
 Please print your name

Jessie Robinson	Jessie Robinson
Deborah Christ	Deborah Christ - Sub

Lucy Corona Lucy Corona
felipe de Jesus Luna terese Luna

Martey Ragone Marty Ragone
Kathleen Terry Kathleen Terry

Shelene M. Johnson Kristine M. Johnson

Deborah Dreaux	Deborah Dreaux
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Responses to Comments

The following staff members of Sierra Middle School oppose the designation of Central Avenue between Brockton Avenue and the Riverside Municipal Airport as an Arterial.
For the health and safety of our students, we do not want diesel trucks using the street in front of our school to travel between Highway 91 and Van Buren Blvd.

Your Signature

Please print your name

<u>Katarina L. Schanz</u>	<u>Katarina L. Schanz</u>
<u>David N. Allbeck</u>	<u>David Allbeck</u>
<u>Joeburn's Alexander</u>	<u>Joeburn's Alexander</u>
<u>Stuart Logan</u>	<u>Stuart Logan</u>
<u>MARTHA V. CARANIE</u>	<u>MARTHA V. CARANIE</u>
<u>JEFF Finger</u>	<u>JEFF Finger</u>
<u>Weda Phillips</u>	<u>Weda Phillips</u>
<u>Diane Velasquez</u>	<u>Diane Velasquez</u>
<u>Tamara Martin</u>	<u>Tamara Martin</u>
<u>Vance Baker</u>	<u>Vance Baker</u>
<u>George Hague</u>	<u>George Hague</u>
<u>Sheila Roche</u>	<u>Sheila Roche</u>
<u>Babatunse Akinnemi</u>	<u>Babatunse Akinnemi</u>
<u>Robert Gordon Davis</u>	<u>Robert Gordon Davis</u>
<u>Cassandra D. Deal</u>	<u>Cassandra D. Deal</u>
<u>Dhy Romero</u>	<u>Dhy Romero</u>

The following staff members Sierra Middle School oppose the designation Central Avenue
between Brockton Avenue and the Riverside Municipal Airport Arterial
For the health and safety of our students, we do not want diesel trucks using the street front
our school travel between Highway 91 and Van Buren Blvd

Your Signature

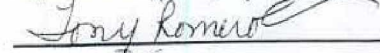
Please print your name




Christine Dombrowski



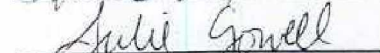
Edwin Rumsey



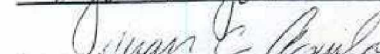
Tony Romero



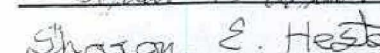
David Beniden



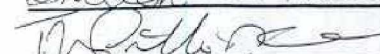
Julie Cowell



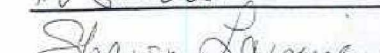
Juan C Aguilar



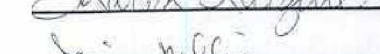
Sharon E. Hester



T. Vincent Prouzet



Sharon Laizure Hofer



Janine Mulligan



Gail Lau



Jeff Franks



John Myers



Monique Conway



Derise Rush



Derise Rush



Derise Rush



Derise Rush



Derise Rush



Derise Rush



Derise Rush

Responses to Comments

The following staff members of Sierra Middle School oppose the designation of Central Avenue between Brockton Avenue and the Riverside Municipal Airport as an Arterial. For the health and safety of our students, we do not want diesel trucks using the street in front of our school to travel between Highway 91 and Van Buren Blvd.

Your Signature

Please print your name

Mary Jane Jones

Mary Jane Jones

Linda P. Smith

Linda P. Smith

Amy Agustin

Amy Agustin

Mary Madison

Mary Madison

Robert Huffman

ROBERT HUFFMAN

Virginia Steckamp

Virginia Steckamp

Rose Ornelas

Rose Ornelas

Karen Gilliland

KAREN GILLILAND


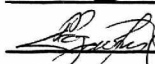


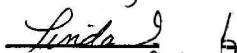
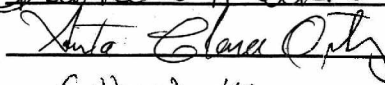
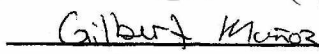
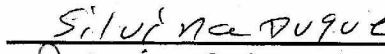
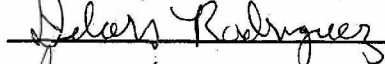

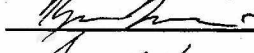
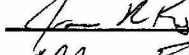
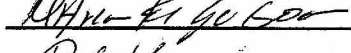
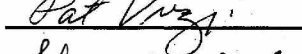
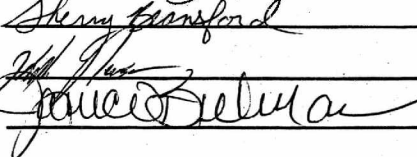
Brenda J. Scherer

Brenda J. Scherer

Annetta Hsu

Annetta Hsu

the following parents of Sierra Middle School students oppose the designation of Central Avenue between Brockton Avenue and the Riverside Municipal Airport as an Arterial. For the health and safety of our children, we do not want diesel trucks using the street in front of their school to travel between Highway 91 and Van Buren Blvd.

Your Signature	Please print your name
	STEVE ENLOW
	JOSE L. MEDINA
	Sonia Alba
	Jeanie Mann
Marilyn Chambers	Marilyn Chambers
	Linda Goff
Shannell Meinhardt	Shannell Meinhardt
	Santa Clara Ortiz
	Gilbert Munoz
	Silvina Dugue
	Deloris Rodriguez
	Joyce Woodard
	Kuzma Tudor
	James R. King
	Pat Virzi
	Sherry Bransford
	Janice Belman

Responses to Comments

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Your Signature	Please print your name
	NORMA FLORES
	Danny Sealt
	Mary Scheltz
	Charles Scheltz
	Stephanie Alba
	Florida Medina
	Maria S. Rodriguez
	ANNE V. SERATTE
	Georgina G. Oram (P.6)
	CLIFF Seratte
	Kameron Palmer
	ANGEL GAYTAN
	Jose Reynoso
	Olga L. Reynoso
	Brian Anderson
	Debra Bassett
	Keith Bassett
	Audrey Wilson
	ARMANDO MUNIZ

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Your Signature	Please print your name
Tahna L. Boaulieu	Tahna L. Boaulieu
Christi Sholes	Christi Sholes
MARIA CARDENAS	MARIA CARDENAS
BiBi Faber	BiBi Faber
Deborah Subia	Deborah Subia
Elaine Miskell	Elaine Miskell
Jamie L. Ramon	Jamie L. Ramon
Barbara LaForge	Barbara LaForge
Robin C. Ruffin	Robin C. Ruffin
Geri Morillo	Geri Morillo
Virginia Jarabla	Virginia Jarabla
Art Subia	Art Subia
NERISSA SILVA	NERISSA SILVA
Cindy Smith	Cindy Smith
EDWIN ARVIDSON	EDWIN ARVIDSON
CINDY ARVIDSON	CINDY ARVIDSON
Patty Ruffin	Patty Ruffin
Vanny Patillo	Vanny Patillo
Megana Patillo	Megana Patillo

Responses to Comments

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Your Signature	Please print your name
	Claudia Pios
Sarah Smeragliuolo	Sarah Smeragliuolo
Pedro Jaramillo	Pedro Jaramillo
Lina Coons	LINA COONS
Olivia Gonzalez	Olivia Gonzalez
Bolca Gonzalez	Bolca Gonzalez
Fabiola Rivera	Fabiola Rivera
Jesus Nasario Mendoza	JESUS NASARIO MENDOZA
Cecilia Delacruz	Cecilia DELACRUZ
Norma Navarro	NORMA NAVARRO
Flenda Medina	Flenda Medina
Maria S Rodriguez	MARIA S RODRIGUEZ
Maria Alamo	Maria Alamo
Evaristo Durque	EVARISTO DURQUE
Alfonso G. Sanchez	ALFONSO G. Sanchez
Teresa Maria Sanchez	TERESA-M. SANCHEZ
Jose Gonzalez	JOSE GONZALEZ
Jana Gonzalez	Jana Gonzalez
Denise Chavez	Denise Chavez

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Your Signature	Please print your name
Monica Ellison	Monica Ellison
Miriam Crooks	Miriam Crooks
Shelia M. Mabee	Shelia M. Mabee
Martha J. Mann	Martha J. Mann
John Cruz	John Cruz
Ana M. St. Lawrence	Ana M. St. Lawrence
Djanna Gahan	Djanna Gahan
Patricia Strick	Patricia Strick
Debbie Morales	Debbie Morales
Mary Mowdy	Mary Mowdy / Rachel Wood
Rona Gooden	Rona Gooden
Veronica Guerrero	Veronica Guerrero
DAVID BELMAN	DAVID & JANICE BELMAN
George Guerrero	George Guerrero
MARIA R GUZMAN	MARIA R GUZMAN
PRALIA SOSA	PRALIA SOSA
Patricia Narmore	Patricia Narmore
James D. Hathaway	James D. Hathaway
LONA DE ROSE	LONA DE ROSE

Responses to Comments

Avenue between Brockton Avenue and the Riverside Municipal Airport as an Arterial.
For the health and safety of our children, we do not want diesel trucks using the street in front of their school to travel between Highway 91 and Van Buren Blvd.

Your Signature

Please print your name

<i>[Signature]</i>	LAURA BAUCOM
<i>[Signature]</i>	Stacy Mondragon
<i>[Signature]</i>	Marta Gurnea
Linda Hastings	MEDLINDA HASTINGS
Vicki WAG	Vicki Wagner
<i>[Signature]</i>	TERESA ANDERSON
<i>[Signature]</i>	THOMAS GLENN
<i>[Signature]</i>	Amy Agustin
<i>[Signature]</i>	Terri N. Whit
Kari O'Dell	Kari O'Dell
<i>[Signature]</i>	SANDY SEBEE
A. Comado	Angela Conrado
Wendy Peterson	Wendy Petusa
<i>[Signature]</i>	Cindy S. Ritter
<i>[Signature]</i>	Jon D Ritter
<i>[Signature]</i>	Sylvia Garcia
Deborah Darling	Deborah Darling
<i>[Signature]</i>	Shawn A. Perinet

The following parents of Sierra Middle School students oppose the designation of Central Avenue between Brockton Avenue and the Riverside Municipal Airport as an Arterial. For the health and safety of our children, we do not want diesel trucks using the street in front of their school to travel between Highway 91 and Van Buren Blvd.

Your Signature	Please print your name
	Ara. Mana Gonzalez.
	Norma Araceli Carrillo
	LARRY BLANCHETTE
	MARTA C. BLANCHETTE
	Tami Valentine
	Dale Valentine
	Dondi Guerrero Romero
	Rosa Elena Pimentel.
	Kristina K Sanchez
	James M Smith
	DONITA LANG SMITH
	Olivia Llanes
	Thomas Bragan
	TERRY COLLINS
	DEAN W COLLINS
	Mirah Elbersow
	Lourdes Borrero

Responses to Comments

Avenue between Brockton Avenue and the Riverside Municipal Airport as an Arterial.
For the health and safety of our children, we do not want diesel trucks using the street in front of their school to travel between Highway 91 and Van Buren Blvd.

Your Signature	Please print your name
	April Valencia
	Joseph M. Hayes
	JAIME E. VALENCIA
	Maxima Bardales
	Juana Cuellar
	John Stephens
	Karie Drew
	Irma Castaneda
	TAMARA HENDRIX
	Roka L. Gooden
	HILDA GUZMAN
	MAURO GUTIERREZ
	JAMES R Schack
	Catherine F Powell
	GEORGINA SANCHEZ A.
	Arturo Mexillo
	Rossana Vargas
	Maria Vargas
	Laura Perez

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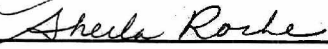

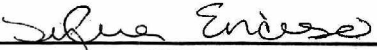


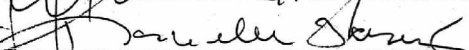





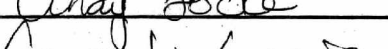

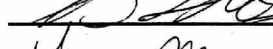
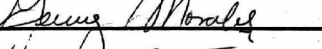

Your Signature

Please print your name

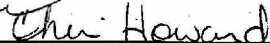

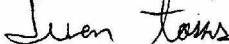



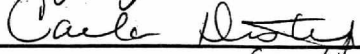




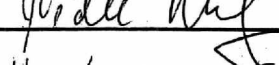
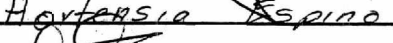
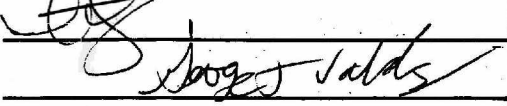
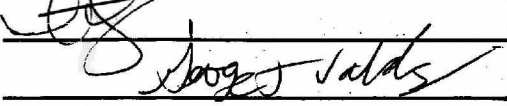
<i>Donald Louis Palmer</i>	DONALD LOUIS PALMER, JR.
<i>Lorie Lee Palmer</i>	LORIE LEE PALMER
<i>Georgina G. Oran</i>	GEORGINA G. ORAN
<i>Juventino Ramirez</i>	Juventino Ramirez
<i>Antonia Moreno</i>	ANTONIA MORENO
<i>Lisa Hayes</i>	LISA HAYES
<i>Laurie Ludwig</i>	Laurie Ludwig
<i>Elenora G. Howell</i>	Elenora G. Howell
<i>Michelle Richardson</i>	Michelle Richardson
<i>Rick Richardson</i>	Rick Richardson
<i>Maria A. Ponzio</i>	Maria A. Ponzio
<i>Elva Escobedo</i>	Elva Escobedo
<i>Paul Sweet</i>	Paul Sweet
<i>Todd & Carol Ann Dauphin</i>	TODD & CAROL ANN DAUPHIN
<i>Jeri Brawley (Paul)</i>	Jeri Brawley
<i>Charles A. Paramo</i>	Charles A. Paramo
<i>Daphne S. Paramo</i>	Daphne Paramo
<i>Gabriel Arroyo</i>	GABRIELA ARROYO

Responses to Comments

- The following parents of Sierra Middle School students oppose the designation of Central Avenue between Brockton Avenue and the Riverside Municipal Airport as an Arterial. For the health and safety of our children, we do not want diesel trucks using the street in front of their school to travel between Highway 91 and Van Buren Blvd.

Your Signature	Please print your name
	Sheila Roche
	Susan Hill
	
	PATRICK BENN
	Yolanda Granaada
	Rochelle Harris
	DAN DISTROLA
	Debra De Felice
	JUAN P TORRES
	Salvador Garcia
	Cindy Locke
	Conrado Garcia
	BRYAN THORNE
	Genny Morales
	Dawn Ontiveros
	Jose Ontiveros Jr.

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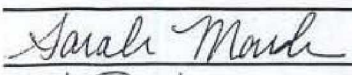

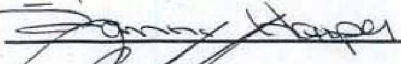





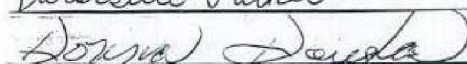

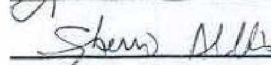

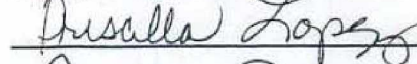


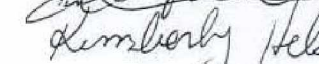

Your Signature	Please print your name
	cheri Howard
	Alma Torres
	Juan Torres
	JOHN O'LEARY
	DAVID TOVAR
	BOBBY RAY HESTER
	Carla Distola
	CARLOS MORAN
	Lachael Moore
	Susan L. Henry
	Amy Campbell
	JOEDEE MOLALEZ
	Hortensia Espino
	Francis Martinez
	GVA LOPEZ

Responses to Comments

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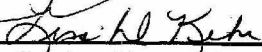

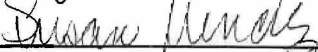

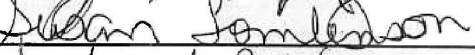


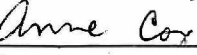
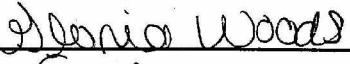
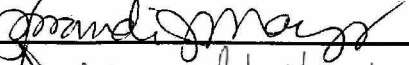


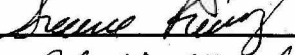

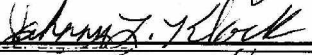
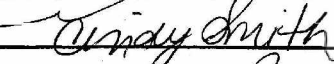
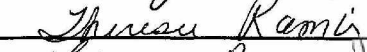
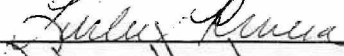
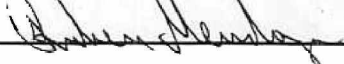

Your Signature	Please print your name
Margy Lowley	
Amelia L. Pineda	Amelia Pineda
Kimberly Foreman	Kimberly Foreman
Barbara Swanson	Barbara Swanson
Mindy Bunkelman	MINDY BUNKELMAN
Esther Fenn	ESTHER FENN
Mark Fenn	Mark Fenn
Kellie Layton	Kellie Layton
Jim Layton	Jim Layton
Harold D. Anderson Sr.	Harold D. Anderson Sr.
Mary M. Anderson	Mary M. Anderson
Candace L. Hobert	Candace L. Hobert
Jackie King	JACKIE KING
Juan Gonzalez	Juan Gonzalez
Bobbie Self	Bobbie Self
Ferr. Ortiz	Ferr. Ortiz
Patti Allen	Patti Allen
Jinx Jennings	Jinx Jennings

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Your Signature	Please print your name
	Sarah Marsh
	Maria Avila.
	SANDRA Harper
	Arthur P. Subia
	Yvonne Turner
	Forest D. H.
	Dara M. Garcia
	DAROSSITTE PARKER
	DONNA LEE DOUGLAS
	Luana B. Eutsler
	SHERI ALLDIS
	MARIO CARRERO
	Priscilla Lopez
	Ricardo M. Ramirez
	Elvira Gallo
	Eia Guerrero
	Kimberly Helsen

Responses to Comments

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Your Signature	Please print your name
	LISA D. KEAR
	Jill McCollier
	Susan Mendez
	Joseph Lopez
	Susan Tomlinson
	MICHELLE M BLACKMAN
	MIKE GRIFFITHS
	Anne Cox
	Gloria Woods
	Brandi Mays
	Dianne Stephens
	Donna Murphy
	Socorro Rodriguez
	Robert J. Murphy
	Johnny L. Klock
	Cindy Smith
	Theresa Ramirez
	LESLIE RIVERA
	Ruben Mendez
	NGA MAI

or their school to travel between Highway 91 and Van Buren Blvd.

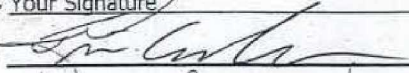

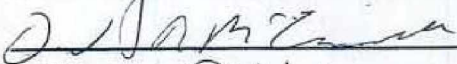
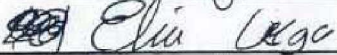

Your Signature	Please print your name
<i>Danny Veder</i>	GARY VEDER
<i>Crystal Lopez</i>	Crystal Lopez
<i>Maria N. Cabral</i>	Maria N. Cabral
<i>Sandra S. Soares</i>	Sandra S. Soares
<i>Joan Gaston</i>	Joan Gaston
<i>Vanny Patillo</i>	Vanny Patillo
<i>Suzanne P. Shumway</i>	Suzanne P. Shumway
<i>KIMBERLY DAMIAN</i>	KIMBERLY DAMIAN
<i>Silvina Duque</i>	Silvina Duque
<i>Yvonne Jones</i>	Yvonne Jones
<i>Lloyd Ridenour Jr.</i>	Isabel Ridenour Lloyd Ridenour Jr.
<i>Steve Schulte</i>	Kelly Schulte
<i>Andrea Bizio</i>	Andrea Bizio
<i>Beth Cole</i>	Beth Cole
<i>Candy Taramillo</i>	Candy Taramillo
<i>Jose M. Miguel Angel Lopez</i>	JOSE M. Miguel Angel Lopez
<i>Ana Ortega</i>	Ana Ortega
<i>SUSAN SILVA</i>	SUSAN SILVA
<i>Elizabeth R. Outivers</i>	ELIZABETH R. OUTIVERS
<i>Joe Reeves</i>	Joe Reeves
<i>Michael J. Samson</i>	Michael J. SAMSON

Responses to Comments

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Your Signature	Please print your name
<i>Stacy Pazderski</i>	JONATHAN KENDALL
<i>[Signature]</i>	D TABER STEPHANIE SUTHER
<i>[Signature]</i>	Melissa Faller
<i>Glenda Conley Aldrich</i>	Glenda Conley Aldrich
<i>Josie Serrano</i>	Josie Serrano
<i>Pauline Dowd</i>	Pauline Dowd
<i>Susan Silva</i>	SUSAN SILVA
<i>[Signature]</i>	Anna Elkins
<i>Shirley Schulte</i>	Kelly Schulte
<i>[Signature]</i>	ANTONIO REORCIO
<i>[Signature]</i>	CINA PAULO
<i>Susan Samson</i>	Susan Samson
<i>Daljit Dhillon</i>	Daljit Dhillon
JEFF COOKE	Bethwa Hartmann (Grandparents)
<i>Laura Lopez</i>	LAURA Lopez
<i>Michelle Hastings</i>	Michelle Hastings
<i>Kim Gonzalez</i>	Kim Gonzalez
<i>Sandie Vedder</i>	Sandie Vedder

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Your Signature	Please print your name
	Tim Connacher
Pam Connacher	Pam Connacher
Josie Serrano	Josie Serrano
Chelly Hunt	Chelly Hunt
	Michael Moore
Linda Moore	LINDA L. Moore
E. Porto	E. Portune
Mary Ann Villaseñor	Mary Ann Villaseñor
	DAVE M'Connell
Dan Alfstad	DAN ALFSTAD
	ELIA VEGA
Ana Melgoza	Ana Melgoza
Dora M Garcia	Dora M Garcia
Valerie Smith	Valerie Smith
Lori Smith	Lori Smith
Teresa Anderson	Teresa Anderson
Derek A. Ellis	Derek A. Ellis
Clara Ortiz	Clara Ortiz
	Jason D. Miller

Responses to Comments

Avenue between Brockton Avenue and the Riverside Home Depot.
For the health and safety of our children, we do not want diesel trucks using the street in front of their school to travel between Highway 91 and Van Buren Blvd.

Your Signature

Please print your name

Chelly Hunt

Ling Espino

3

Sherry J. Pomeroy

Alicia Bort

April D. Davis

JoAnne Pirante

Julie King

Corrina L. Miller

Deanna Kinder

Virginia Buraker

Jeffrey

Arturo Morillo

Jose Leo Navarro

Linda Schutz

Dore Cannizz

Alicia BORT

LISA DAVIS

JoAnne PIRANTE

Julie King

Corrina L. Miller

Deanna Kinder

Virginia Buraker

Jeff Ludwig





Arturo Morillo

Jose Leo Navarro

Katie Scheetz ^{LINDA} _{schee}

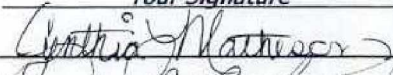



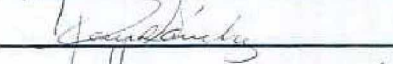



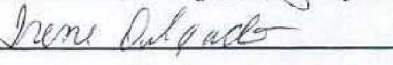
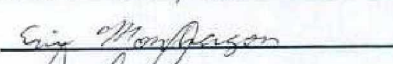







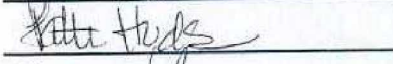

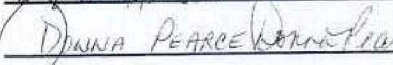
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04

<i>Your Signature</i>	<i>Please print your name</i>
	Rowan Rincon
Cher Howard	Cheri Howard
Tina Malmberg	Tina Malmberg
Angelica Brown	ANGELICA BROWN
Alma A. Oviedo	Alma A. Oviedo
Ana Lilia Camarena F.	Ana Lilia Camarena
	ADRIANA TRUJILLO
Deshaun Kelly	Deshaun Kelly
Danny Smith	Danny Smith
Armando Muniz	ARMANDO MUNIZ
Sylvia Arroyo	SYLVIA ARROYO
Catalina Ruiz	Catalina Ruiz
Maria Rizo	Maria Rizo
Sandy Bedwell	Sandy Bedwell
	Marcelo Valadez
Marcelo Valadez	Marcelo Valadez
Pascual Villagomez	Pascual Villagomez
James M. Wood	James M. Wood
	Pamela Herrera
Denise Taylor	DENISE TAYLOR
Edward J. Butts Jr	Edward J. Butts Jr
Pamille Butts	Pamille Butts

Responses to Comments

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<i>Your Signature</i>	<i>Please print your name</i>
	Cynthia Matheson
	DAVE MATHESON
	Phyllis M. Mabey
	Ray Kinder
	Amelia R. Sanchez
	Gracina Villagomez
	LYNN SCHONDER
	RUTH MARKIGATH
	TYLENE DELGADO
	ERIC MONCHEGON
	Paula Rivers
	Gabriela Machado
	Carmen Higareda
	MARCH RAINBAT
	VICKIE FISHER
	Leon A. ST. LAWRENCE
	ANA M. ST. LAWRENCE
	Patti Hudson
	BART HUDSON
	DONNA PEARCE

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04

<i>Your Signature</i>	<i>Please print your name</i>
Rigoberto & Juana Ambroz	RIGOBERTO AMBROZ
Deb Lewellen	Deb Lewellen
Mary R. Page (4th person)	Branaly R. Page (Rally Trainer)
Vivi Hernandez	Eddie Hernandez
Mary Toepfer	Mary Toepfer
Joseph & Lynne Diaz	
Joseph & Lynne Diaz	Joseph & Lynne Diaz
Adelina Ramirez	Adelina Ramirez
Flenda Medina	Flenda Medina
Tamara D'Oratio	Tamara D'Oratio
Melanie Evans	Melanie Evans
Esperanza Maciel	Esperanza Maciel
Guadalupe Bortolan	Guadalupe Bortolan
Mynette Henderson	Mynette Henderson
IAN C. ARANGURE	IAN C. ARANGURE
Denise Chavez	Denise Chavez
Veronica Overreno	Veronica Overreno
Margaret Calderon	Margaret Calderon
Kada Cossins	Kada Cossins
EDWIN ORTIZ	EDWIN ORTIZ

Responses to Comments

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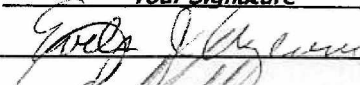
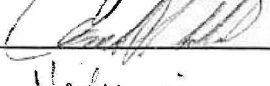

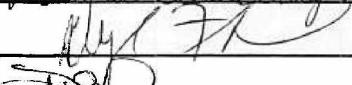
<u>Your Signature</u>	<u>Please print your name</u>
	Andrea Rosales
Rosemary M. Anderson	Mary M. Anderson
Maria Cruz	Maria Cruz
Laura C. Sanchez	Laura C. Sanchez
Maria Valladares	Maria Valladares
	DANELLE A. DOLEN
	PATRICIA STOCKS
	Jamie Ardu
Juventina Ramirez	Juventina Ramirez
Yolanda Moreno	YOLANDA MORENO
	BRIAN THERNE
	SABAS PEREZ
Rosemary Price	ROSEMARY PRICE
Julia Ephraim	Julia Ephraim
Veronica Rodriguez	Veronica Rodriguez
DeAnna Bickett	DeAnna Bickett
Leticia Murillo	Jovana Murillo
Louise F. Mireles	Louise F. Mireles
	ERIC GROUNDS
	THANH TAM PHAM

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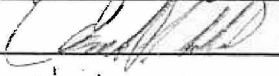


<i>Your Signature</i>	<i>Please print your name</i>
<i>Santa Clara Pantoja</i>	Santa Clara Pantoja
<i>Zouides Barragan</i>	Zouides Barragan
<i>Verlon L Waring</i>	Verlon L Waring
<i>Luzy Maldonado</i>	Luzy Maldonado
<i>Lilia Corona</i>	Lilia Corona
<i>Teresa Moudy</i>	Teresa Moudy
<i>Richard A. McDonald</i>	Richard A McDonald
<i>Arlis Kellogg</i>	Arlis Kellogg
<i>Chris Fuller</i>	CHRIS FULLER
<i>Geri Murillo</i>	Geri Murillo
<i>Secma Hasan</i>	Secma Hasan
<i>MAIKO GUTIERREZ</i>	MAIKO GUTIERREZ
<i>Patricia Hermenegildo</i>	Patricia Hermenegildo
<i>Patricia Rodriguez</i>	Patricia Rodriguez
<i>Roberta Jeanne Hood</i>	Roberta Jeanne Hood
<i>Jennifer L Porter</i>	Jennifer L Porter
<i>CHANDA WILLIAMS</i>	CHANDA WILLIAMS
<i>HILDA GUZMAN</i>	HILDA GUZMAN
<i>JEANE M. SWARC</i>	JEANE M. SWARC
<i>RICHARD J ANZELINO</i>	RICHARD J ANZELINO

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<i>Your Signature</i>	<i>Please print your name</i>
	Evelyn J. Anzevino
	Arthur Sabia
Harley	Lorlene Grace
Kimberly	Jennifer Raymond
Ed: Cindy Davidson	CINDY ARVIDSON
Aimee Vierra	Aimee Vierra
Kevin Claborn	Kevin Claborn
E. Portune	E. Portune
Dondi Romero	DONDI ROMERO
Jason Hyde	JASON HYDE
Lisa Hayes	LISA HAYES
Joan Hayes	Joan Hayes
	ALAN SILVA JOSE
Susan Silva	Susan Silva
Elaine Miskell	Elaine Miskell
Laura Boatwright	Laura Boatwright
	DARYL FINN
Daphne Paramo	Daphne Paramo
Mai Pham	Mai Pham

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<i>Your Signature</i>	<i>Please print your name</i>
	Evelyn J. Anzevino
	Arthur Scibio
Harley in	Harley in
Kimberly Ramin	Jennifer Raymond
Ed: Cindy Wiedson	CINDY ARVIDSON
Aimee Vierra	Aimee Vierra
Kevin Claborn	Kevin Claborn
E. Portune	E. Portune
Dondi Romero	DONDI ROMERO
Jason Hyde	JASON HYDE
Lisa Hayes	LISA HAYES
Joan Hayes	Joan Hayes
	ALAN SILVA. JOSE.
Susan Silva	Susan Silva
Elaine Miskel	Elaine Miskel
Laura Boatwright	Laura Boatwright
	DAPHNE PARAMO
Daphne Paramo	Daphne Paramo
Mai Pham	Mai Pham

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<i>Your Signature</i>	<i>Please print your name</i>
	RAUL SILVA JR.
	GLORIA WOOD
	Andres Rosales
	Elaine Miskell
	Deena Robertson
	LARRY LARUB
	Angelica Brown
	Santa Clara Ortiz
	Rossana Vargas
	Sandra Vargas
	Mark Fenn
	Sherica Pettigrew
	Christina Perez (Hunt)
	LIZA LA RUE-HATHAWAY
	Jim Hathaway
	GREG L MORALES
	Harold Ross
	Tonja Ross
	Matt Sanderson
	Christine Perez (Hunt)
	JOSE H. SIGARAN

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<i>Your Signature</i>	<i>Please print your name</i>
	LINDA Scheetz
	Jane Fer Lermo
	Linx Jennings
	Sylvia Le
	MARVIN LE
	Carmen Stewart
	Nancy Waddell
	ERIN M. Strauss
	Maxime Bardals
	GUADALUPE DURAN
DANIEL McNEUR	Daniel McNeur
	ANDREA McHenry
	LUCIA BORNT
	Jeff Ludwig
	Laurie Ludwig
	Amy Naye
	PAT Lermo
	ANA Duran
	RAUL SILVA
	Debra Robert

Responses to Comments

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<i>Your Signature</i>	<i>Please print your name</i>
Bibi Faber	BIBI Faber
Julia Ephraim	Julia Ephraim
Humberto Flores	Humberto Flores
Scott Waskowski	SCOTT WASKOWSKI
Thomas Glenn	Thomas Glenn
Gabriela Cisneros	Gabriela Cisneros
Wina Johnson	Wina Johnson
Dianne Stephens	Dianne Stephens
Joanne Benton-Cosi	JOANNE BENTON-COSI
John Stephens	John Stephens
Ralph Uribe	Ralph Uribe
Rossana Vargas	Rossana Vargas
Alfonso Sanchez	Alfonso Sanchez
Haydee Rodriguez	Haydee Rodriguez
Dennis Sauer	Dennis SAUER
Yvonne Olson	Yvonne Olson
Esther Fenn	Esther Fenn
Sherry L. Barton	Sherry L. Barton
Suzanne Guth	SUZANNE GUTH
Charles R. Hyatt	CHARLES R. HYATT

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<i>Your Signature</i>	<i>Please print your name</i>
<i>C. Mendoza</i>	Candace Mendoza
<i>Karen Haller</i>	KAREN HALLER
<i>Yvette Ramirez</i>	Yvette Ramirez
<i>Alfred Ramirez</i>	Alfred Ramirez
<i>Lore Ruiz</i>	Lore Ruiz
<i>Katherine S. Ruiz</i>	Katherine S. Ruiz
<i>Ann Dunbar</i>	Ann Dunbar
<i>Michele Reed</i>	Michele Reed
<i>Maureen Martinez</i>	Maureen Martinez
<i>Joshua Harrington</i>	Joshua Harrington
<i>Miguel Ramos</i>	Miguel Ramos
<i>Miniam Croots</i>	Kimberly Rodriguez
<i>Juan Torres P</i>	Juan Torres P
<i>Bart Boyer</i>	BART BOYER
<i>Audrey Boyer</i>	Audrey Boyer
<i>Gina Eskew</i>	Gina Eskew
<i>Martha Nolasco</i>	Martha Nolasco
<i>Louis R. Herrly</i>	Louis R. Herrly
<i>Barbara J. Herrly</i>	Barbara J. Herrly

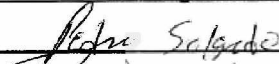




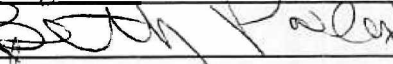

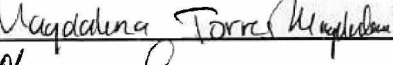
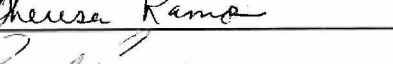
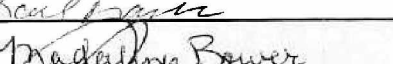






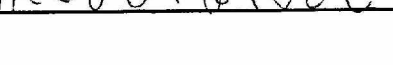

Responses to Comments

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<i>Your Signature</i>	<i>Please print your name</i>
	ERICA Aguilar
	Francine HERNANDEZ
	Marijo Hernandez
	DANIELA ABARCA
Bertha Rivera	Estana Bertha Rivera Bertha Rivera
Maricela Solis	Maricela Solis
	YOLANDA LOESER
	ANTHONY BEACHLER
Daniel Diaz	
	Stepie Shellenbach
Ray McLaughlin	Ray McLaughlin
Michelle Keenan	Michelle Keenan
CATHARINA CECCHINI	
Elisa Falk	Elisa Falk
	Ryan Falk
Linda Thompson	Linda Thompson
Xochilt Vargas	XOCHILT VARGAS
Diane Harris	Diane Harris
Janine Papawro	Janine Papawro

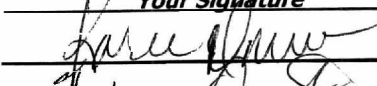
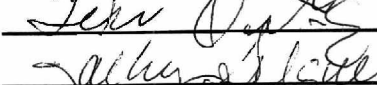

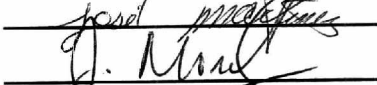
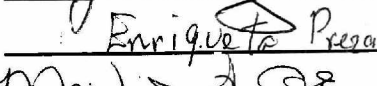
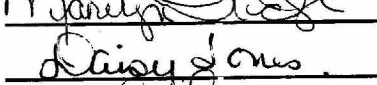

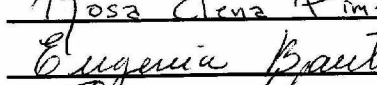
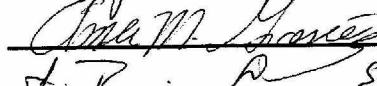
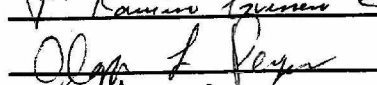
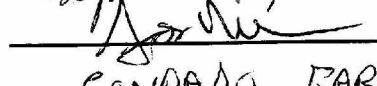
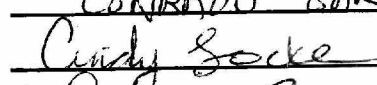
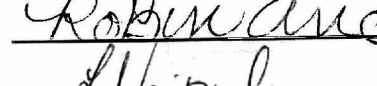
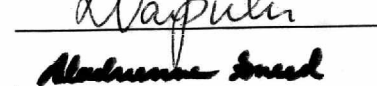






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<i>Your Signature</i>	<i>Please print your name</i>
	Pedro Salgado
	BRIGIDA Montgomery
	Mayra Espinoza
	Cynthia Klein
	EFREN M. VELASQUEZ
	Gabriele Therese Hare
	Jeremy Pawlert
	George Andrew Medina
	Magdalena Torres
	Theresa Ramos
	Raul Ramos
	MADALINE Bower
	DOMINICK SPENCER
	SYMON SPENCER
	SYMON EVANS
	Symon Spences
	Erik Pineda
	Erik Pineda

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04

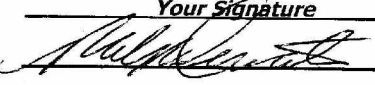




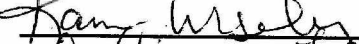
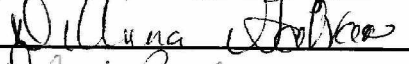

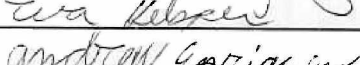
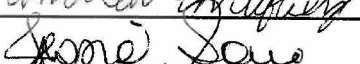
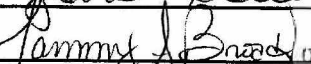
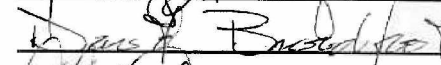
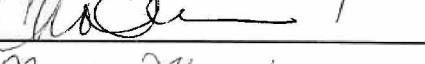
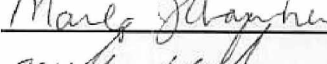
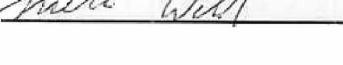
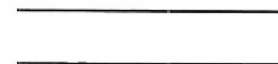
<i>Your Signature</i>	<i>Please print your name</i>
	Karie Drew
	Ferni Ortiz
	Kathy Silguero
	Danna Scott
	JOSE MARTINEZ
	JUDEE MURKES
	Enriqueta Preza
	Marilyn Hodge
	Daisy Jones
	Irene Martinez
	Rosa E. Primentel
	Eugenia Bautista
	Ana M. Torcia
	J. Ramiro Armas C.
	Olga L. Reynoso
	Sose Reynoso
	RICARDO BARCIA
	Cindy Locke
	Robin Arroyo
	LUCYTANIA VAIPULU
Madrienne Sneed	MADRIENNE SNEED

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Your Signature	Please print your name
<i>Katherine Muniz</i>	Katherine Muniz
<i>Lucytania Vaipulu</i>	LUCYTANIA VAIPULU
<i>James Goff</i>	James Goff
<i>Derek A. Ellison</i>	Derek A Ellison
<i>Olivia Gonzalez</i>	Olivia Gonzalez Olivia Gonzalez
<i>Lorie Fisher</i>	LORIE FISHER
<i>Laura Baucom</i>	LAURA BAUCOM
<i>Laura Petrillo</i>	Laura Petrillo
<i>Chuck Paramo</i>	Chuck Paramo
<i>Leticia Garcia</i>	Leticia Garcia
<i>MARIA MARIA Castillo</i>	MARIA CASTILLO
<i>Elipe de Jesus Luna</i>	Elipe de Jesus Luna
<i>Ammando Muriel</i>	Ammando Muriel
<i>Jose A. Gonzalez</i>	JOSE GONZALEZ
<i>Julio Sanchez</i>	Julio Sanchez
<i>Virginia Melendez</i>	Virginia Melendez
<i>Bertha Melendez</i>	Bertha Melendez

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Your Signature	Please print your name
	Ralph Cervantes
	JOSÉ GONZÁLEZ
	Adrian Morales
	Victorina Llamas
	Dan & Meinhard
	KAREN WISELEY
	DIANA GANAN
	Deloris Rodriguez
	EVA HELSPER
	Andrew Enriquez
	Jessica Soria
	Tammy A Broadfoot
	DAVID (RANDY) BROADFOOT
	Christine Navarro
	Marilyn Chambers
	Mike Welch

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Your Signature	Please print your name
Kimberly Woodall	Kimberly Woodall
Cliff Scott	Jorge Carter CLIFF SCOTTE
David Valencia	April Valencia
Marquita Lyons	Marquita Lyons
Mary Madison	Mary Madison
Jupiter Ahumada	Jupiter Ahumada
David H. Williams	DAVID H WILLIAMS
Enrique Pacheco	Enrique Pacheco
Lisa Arteaga	Lisa Arteaga
Norma C. Ruelas	
Alfredo Rodriguez	ALFREDO RODRIGUEZ

